Privacy and Data Handling Policy

Last updated 19 October 2026

Effective Date: 1st January 2024

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Flex-Able Ltd ("we", "us", or "our") is committed to protecting your privacy and handling data responsibly.

This Privacy and Data Handling Policy outlines how we collect, use, store, protect and share personal information and operational data in accordance with applicable New Zealand law, including the Privacy Act 2020.

1. Information We Collect

We may collect the following types of personal information:

- Contact information (e.g. name, email, phone number);
- Energy usage data and device data related to our services;
- Account registration and subscription details;
- Any communications you send to us or feedback you provide.

We may collect information directly from you and, where appropriate, from third parties (such as our partners who provide our service to you).

2. How We Use Your Information

We use your personal information to:

- Provide, maintain, and improve our services;
- Respond to inquiries and provide customer support;
- Deliver updates, service alerts, and notifications;
- Meet legal and regulatory obligations;
- Analyse aggregated and anonymised data for research or performance reporting.

3. Information and Data Sharing

Flex-Able Ltd may share operational data, including electricity consumption data, device performance information, system operating data and associated analytics, with customers, electricity industry participants, service providers, technology partners and other authorised parties.

Such sharing may occur in connection with the provision of our services, energy management, flexibility services, grid support, reporting, analytics, commercial arrangements and other legitimate business activities.

Operational data will be handled and shared confidentially, in accordance with applicable law, our Terms and Conditions, and any relevant commercial, confidentiality or data-sharing agreements.

Where operational data constitutes personal information, its collection, use and disclosure will be undertaken in accordance with the Privacy Act 2020 and applicable privacy obligations.

Flex-Able Ltd may receive payment or other commercial consideration for providing operational data, analytics or associated services. Such arrangements do not, of themselves, constitute the sale of personal information.

3A. Operational Data Collection and Use

As part of providing our technology services, Flex-Able Ltd may collect, receive, access, store, process and analyse operational data relating to electricity consumption, energy systems, connected assets, device performance, network conditions and other information associated with the operation of our services.

Operational data may be obtained directly through our technology platforms, from connected systems and devices, or from customers, service providers and other authorised parties.

We may use operational data for purposes reasonably connected with the provision, operation, maintenance, optimisation, development and improvement of our services, including energy management, flexibility services, grid support, reporting, analytics and participation in electricity industry activities.

Nothing in this Policy authorises the collection, use or disclosure of information in breach of applicable law or binding contractual confidentiality obligations.

4. Data Storage and Security

We take reasonable steps to ensure your data is protected from unauthorised access, alteration, disclosure, or destruction. This includes the use of encryption, secure storage, and access controls where required.

5. Access and Correction

You have the right to access and request correction of your personal information at any time. To make a request, contact us at the details below.

6. Retention

We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, or to comply with applicable legal or regulatory requirements.

Operational data may be retained for the provision, operation, development and improvement of our services, including analytics, reporting, flexibility services and other legitimate commercial purposes, subject to applicable law and any binding contractual confidentiality, retention or deletion obligations.

7. Contact Us

If you have any questions or concerns about this Privacy and Data Handling Policy or our data practices, please contact us at:

load@flex-able.co.nz

We may update this Privacy and Data Handling Policy from time to time. Any changes will be posted on our website with the updated effective date.