

EVO by DIMO

PRIVACY NOTICE

EV Charging Application
Last Updated: May 2026

1. Introduction

DIMO (Private) Limited (hereinafter “DIMO”) is a company duly incorporated under the laws of Sri Lanka, bearing company registration number PV 2317, with its registered office located at No. 65, Jethawana Road, Colombo 14, Sri Lanka. DIMO operates across various sectors, including automotive, engineering solutions, building technologies, power and energy, agriculture, and retail.

For the purpose of this Notice, “DIMO” encompasses DIMO (Private) Limited and any company directly or indirectly owned and/or controlled by DIMO that you interact with or have a business relationship with, collectively known as the “DIMO Group”. Find out more about the DIMO Group at <https://www.dimolanka.com/about-us/our-subsidiaries>.

This Privacy Notice (“Notice”) is committed to protecting your privacy and handling your Personal Data responsibly in full compliance with the Personal Data Protection Act No. 9 of 2022 of Sri Lanka (“PDPA”). It explains how we collect, use, process, store, disclose, and protect your Personal Data when you interact with us, including through the EVO by DIMO mobile application (the “App”), services, products, websites, and other platforms.

We act as the Data Controller for all Personal Data relating to our customers, investors, employees, service providers, principals, and third-party contractors, as well as any other Personal Data processed in connection with our business operations.

By creating an account, accessing, or using the App, you acknowledge that you have read, understood, and agreed to this Privacy Notice and consent to the collection and processing of your Personal Data as described herein.

1.1 Essential Information You Should Be Aware Of

This Privacy Notice is designed to clearly inform you about:

- How we safeguard your Personal Data: including when you use any of our services, apply for a career with us, enter into a contract, visit our websites, or interact with us through various channels such as phone calls, emails, mobile applications, and social media platforms.
- Your privacy rights: the rights you have regarding your Personal Data and how you can exercise them.
- The legal protections in place: how applicable laws, specifically the PDPA, safeguard your data.

Your provision of Personal Data is voluntary; however, declining to provide it may prevent us from delivering certain products or services or addressing your queries.

We only use your Personal Data for the specific purpose for which it was collected. If we require it for a different purpose, we will ensure the new purpose is compatible with the original. If we need to use your Personal Data for an unrelated purpose, we will notify you, explain the legal basis, and where relevant obtain your prior consent.

1.2 Your Responsibility to Provide Accurate and Updated Information

Maintaining accurate, valid, and up-to-date Personal Data is essential. You are responsible for ensuring that the Personal Data you provide is accurate, complete, and current. We kindly request that you inform us immediately of any changes so that we can maintain the accuracy of our records.

1.3 Your Obligation to Secure Your Personal Devices

You are solely responsible for maintaining the security of any personal devices used to communicate with DIMO or to transmit Personal Data to us. While we implement appropriate security measures, no transmission of data over the internet is entirely secure. You must ensure that all devices are properly secured against cyber threats and unauthorized access, and you are responsible for safeguarding your account credentials and for verifying the authenticity of any communication claiming to originate from DIMO.

1.4 Obtaining Lawful Consent When Sharing Others' Information

Where you provide DIMO with Personal Data relating to another individual, you confirm and warrant that you have obtained the informed and specific consent of that individual to share their Personal Data with us, that such individual has been fully informed of this Privacy Notice, and that the data provided is accurate, complete, and up to date.

1.5 Caution Regarding External Websites and Third-Party Links

This App or any linked document provided by us may contain links to third-party websites, plug-ins, or applications not owned or controlled by DIMO. DIMO has no control over and assumes no responsibility for the privacy practices, content, or security of such third-party services. We encourage you to review their privacy notices before providing any Personal Data. Your use of such services is at your own risk.

2. Personal Data We Collect

We collect Personal Data necessary to provide, maintain, improve, and secure the App and related EV charging services. The following categories of data may be collected, depending on the products and services you use, your device, and your account settings.

2.1 Information You Provide Directly

- Basic Personal Identifiers: name, telephone number, residential or billing address, email address, government-issued identifiers (e.g., national identification/passport numbers, driver's license numbers), and signatures.
- Account login information and social media information.
- Vehicle details, including EV make/model and registration number (where applicable).
- Customer support requests, complaints, or inquiries.
- Information submitted when participating in promotions, surveys, or loyalty programs.
- Financial Information: credit or debit card numbers and financial account numbers. Note: Payments made through the App are processed by authorized third-party payment service providers. DIMO does not directly collect or store full payment card details.

2.2 Charging and Transaction Information

To facilitate EV charging services, we may collect:

- Charging station details: station ID, connector number or charger identifier, and QR code or station authentication details.
- Charging session details: start and end times, duration, electricity consumed, and estimated and actual charging cost.
- Payment details: billing and payment transaction history, invoices, and receipts.

2.3 Automatically Collected Data

When you use the App, we may automatically collect:

- Device and Online Identifiers: device type and model, device ID, operating system, IP address, mobile network information, MAC address, and cookie IDs.
- App usage analytics.
- Crash reports and diagnostics.
- Browser type (where relevant).

- Cookies or similar technologies.
- Internet and Other Network Activity Information: information about your browsing or search activity and your interactions with our websites, mobile applications, emails, and social media platforms.

2.4 Device Permissions

Depending on App functionality, we may request access to:

- Location Services: To identify nearby charging stations, route services, and location-enabled charging features.
- Camera Access: To scan QR codes, charging station identifiers, or related charging access tools.
- Photo/Media Access: For profile updates or support submissions where applicable.
- Push Notifications: To provide charging updates, payment confirmations, receipts, service alerts, and promotional notifications (where consented).

You may manage permissions through your device settings. Disabling certain permissions may limit App functionality.

2.5 Collection of Special Categories of Personal Data

“Special categories of personal data” include data relating to race, ethnicity, religion, health, sexual orientation, genetic data, or biometric data, and receive additional protection under the PDPA.

DIMO limits the circumstances under which such data is collected and processed. We will only process special categories of Personal Data where we can satisfy an additional lawful condition, such as:

- You have provided explicit consent.
- The processing is necessary to respond to an emergency threatening your life, health, or safety.
- The processing relates to Personal Data you have manifestly made public.
- The processing is necessary for the establishment, exercise, or defence of legal claims.
- The processing is otherwise expressly permitted under relevant laws or regulations of Sri Lanka.

2.6 Consequences of Withholding or Falsifying Personal Data

Where collection of Personal Data is required by law, by contract, or to furnish services, your failure to provide such data may impede our ability to deliver services or enter into a contract with you. Where we have reason to believe any Personal Data provided is false or misrepresented, we reserve the right to refuse services, terminate any existing contract, and where relevant report the matter to the appropriate regulatory authorities.

3. How We Use Your Personal Data

We use your Personal Data for legitimate business and service-related purposes, including:

- Registering, maintaining, and securing your account, including identity verification.
- Providing and managing EV charging services: charging station access, session management, nearby station location, charging history, and account records.
- Processing payments, billing, receipts, and invoices.
- Providing customer support and responding to inquiries, complaints, and service requests.
- Improving App functionality, performance, security, and user experience, including fraud prevention, troubleshooting, and technical monitoring.
- Sending transactional communications, including charging updates, receipts, and service alerts.
- Sending promotional or marketing communications where you have opted in.
- Conducting business analytics and projections to identify areas for operational improvement.
- Administering competitions or promotions you have entered.
- Verifying the quality or safety of our services and devices, including training our AI systems where applicable.

- Complying with applicable legal and regulatory obligations.

3.1 Legal Basis for Processing Your Data

We process your Personal Data on one or more of the following legal bases:

- Consent: Where you have provided consent, you have the right to withdraw it at any time.
- Contract Performance: To perform a contract to which you are a party, or to take steps at your request prior to entering into a contract.
- Legal Obligation: Where we are required to process your data to comply with applicable Sri Lankan law.
- Legitimate Interests: Where processing is necessary to achieve a legitimate interest of ours or a third party, provided it does not outweigh your rights as an individual.
- Vital Interests: To respond to an emergency threatening the life, health, or safety of you or another person.

3.2 Automated Decision-Making

In some instances, DIMO may process your Personal Data using automated means. We will not generally make decisions based solely on automated processing. If we do, we will notify you, provide clear information about our decision and its lawful basis, and, where applicable, afford you the right to request a human review.

3.3 Artificial Intelligence

We may provide AI-powered applications or experiences, such as chatbots, within the App. Where such tools are used, we will communicate that you are interacting with Artificial Intelligence and not a human. We may share your Personal Data with the providers of these AI tools for the limited purpose of providing the relevant application or experience.

4. Third-Party Login and Authentication

Where available, you may choose to register or log in through third-party authentication providers (such as Apple or Google). In such cases, we may receive limited profile or authentication information in accordance with your settings with those providers and their applicable privacy policies.

5. Payments

Payments made through the App may be processed by authorized third-party payment processors, banks, or financial institutions. Such providers may collect payment card details, billing information, and transaction verification details directly in accordance with their own privacy notices. DIMO does not ordinarily store full payment card details unless legally required or operationally necessary.

6. Disclosure of Your Personal Data

We may disclose your Personal Data only where necessary and lawful, and for purposes consistent with this Privacy Notice, including to:

6.1 DIMO Group Companies

As part of a larger business group, DIMO may disclose your Personal Data with other entities within our corporate family for purposes consistent with this Privacy Notice, allowing for a more integrated and efficient service across our related operations. Find out more about the DIMO Group at <https://www.dimolanka.com/about-us/our-subsidiaries>.

6.2 Vendors and External Partners

We work with various external entities to operate our business, deliver services, and enhance your experience. These include:

- EV charging infrastructure providers and charging network operators.

- Payment processors and financial institutions.
- Cloud hosting and IT service providers.
- Analytics and diagnostic service providers.
- Shipping and logistics providers, billing and refund processing companies.
- Sponsors or other third parties involved in administering promotions.

These vendors only have access to the Personal Data necessary to perform their functions and are contractually prohibited from using it for other purposes. They must process Personal Data in accordance with this Privacy Notice, subject to appropriate safeguards, and only as permitted under the PDPA.

6.3 Legal, Regulatory, and Law Enforcement Authorities

We may disclose your Personal Data when required by law or legal process, or when we genuinely believe it is necessary to protect the safety, property, or rights of individuals or DIMO, including:

- Complying with a court order, search warrant, or other valid legal obligation.
- At the request of governmental authorities conducting an investigation.
- To detect and protect against fraud, financial risk, or security vulnerabilities.
- To respond to an emergency threatening the life, health, or safety of individuals.
- To verify or enforce our Terms of Use or other applicable policies.

6.4 Business Transfers

Should DIMO plan to merge, sell, or reorganize its business, your Personal Data may be disclosed as part of the business arrangement. In such transactions, your Personal Data is generally one of the transferred business assets but remains subject to the commitments made in this Privacy Notice unless you consent otherwise.

7. Cookies and App Analytics

To enable our systems to recognize your browser or device and to provide and improve services, we may use cookies and other identifiers, including server logs and similar technologies.

Cookies are small text files sent to your device when you visit websites or use online services. They allow our App and website to remember your preferences and personalize content for you. You may manage certain tracking preferences through your device or application settings. However, disabling certain cookies may limit functionality.

For more detailed information, please refer to our dedicated Cookie Policy.

8. Data Security

We make every effort to protect your Personal Data from misuse, interference, loss, unauthorized access, modification, or disclosure. Our measures include:

- Implementing appropriate access controls.
- Investing in the necessary Information Security Capabilities to protect our IT environments.
- Encrypting, pseudonymizing, and anonymizing Personal Data whenever possible.
- Restricting access to Personal Data to employees and agents on a need-to-know basis.
- Subjecting third parties who process your data to strict contractual confidentiality obligations.

While we implement appropriate security measures, no transmission of data over the internet is entirely secure. You remain responsible for safeguarding your account credentials.

9. Data Retention

We retain your Personal Data only for as long as reasonably necessary to:

- Provide App services and maintain account functionality.
- Process payments and transactions.

- Fulfill legal and regulatory obligations.
- Resolve disputes and prevent fraud and abuse.
- Address any complaints, questions, concerns, or legal actions related to your use of the App.

We regularly review the Personal Data we hold. When your Personal Data is no longer required, it will be securely deleted or, in some cases, anonymized.

10. Cross-Border Data Transfers

Your Personal Data may be stored or processed in Sri Lanka or in other jurisdictions where DIMO, its affiliates, or service providers operate. Any such international transfer will only occur:

- To a country prescribed by the Data Protection Authority of Sri Lanka pursuant to an adequacy decision; or
- If to a country not so prescribed, only when we are satisfied that we can comply with our mandatory obligations under the PDPA, and we have executed an appropriate instrument as prescribed by the Data Protection Authority of Sri Lanka with the recipient.

DIMO will implement appropriate safeguards in accordance with the PDPA for all cross-border transfers.

11. Your Rights

Subject to applicable law, you have the following rights regarding your Personal Data:

- The right to be informed: to receive clear and transparent information about how we use your Personal Data.
- The right to access, rectification, and completion: to access your Personal Data and request correction or completion of any inaccurate or incomplete information.
- The right to erasure: to request deletion of your Personal Data under specific circumstances.
- The right to restrict processing: to request that we restrict processing in certain limited situations.
- The right to object: to object to further processing of your Personal Data under specific circumstances.
- The right to lodge a complaint with the Data Protection Authority of Sri Lanka.
- The right to withdraw consent: to withdraw consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.
- Rights related to automated decision-making: to request a review of a decision based solely on automated processing in certain circumstances.

Please note that we may charge a reasonable administrative fee for requests we consider unreasonable or excessive, or for additional copies of your Personal Data. Requests may be submitted through the contact details in Section 13.

12. Children's Privacy

The App is intended for individuals aged 18 years or older. Where a service is intended for a younger audience, we will obtain consent from a parent or legal guardian before collecting Personal Data relating to a child under the age of eighteen (18) years, as required by applicable laws and regulations in Sri Lanka.

If you are a child under the age where parental consent is required, you should review this Privacy Notice with your parent or guardian. We do not knowingly collect Personal Data from children without appropriate lawful consent. If we discover that we have collected Personal Data from a child without the necessary consent, we will delete that Personal Data as soon as practical. We may use your Personal Data to carry out age verification checks and enforce such age restrictions.

13. Notice Updates

We may update this Privacy Notice from time to time to reflect operational, legal, or regulatory changes. Any updated version will be made available on the App and will take effect upon posting unless

otherwise stated. You can determine when this Notice was last revised by referring to the “Last Updated” date at the top.

We encourage you to review this Privacy Notice periodically to stay informed about our data protection practices.

Where changes are material, such as changes to the categories of data collected or the purposes of processing, we will provide additional notice proportionate to the significance of the changes, which may include an in-app notification, a prominent notice on our platform, or direct communication via email. If any update materially reduces the protection afforded to your previously collected Personal Data or alters the legal basis for processing, we will obtain your express consent where required by the PDPA. Your continued use of the App after the effective date of a non-material update constitutes your acknowledgment of the revised terms.

In addition to this Privacy Notice, specific campaigns or promotions may be governed by supplementary privacy terms. We advise you to review these before participating.

14. Contact Us

If you have any questions or concerns about this Privacy Notice, our data processing practices, or if you wish to update your data or make a complaint regarding a potential breach of local privacy laws, please reach out to us.

You can contact our Data Protection Officer via email at DPO@dimolanka.com.

Alternatively, you can submit inquiries or complaints through the following channels:

- Call: 011 244 9797
- SMS/WhatsApp: 07658618
- Website: Submit a request through the “Contact Us” form on our websites at <https://www.dimolanka.com/contact-us/>

15. Consent

By registering for and using the DIMO EVO App, you acknowledge that you have read and understood this Privacy Notice and consent to the collection, processing, use, and disclosure of your Personal Data in accordance with this Privacy Notice and applicable law.

16. Clarification of Key Terminologies

Personal Data: Any information relating to an identified or identifiable natural person (‘Data Subject’), including name, identification number, location data, or online identifier.

Processing: Any operation performed on Personal Data, whether or not by automated means, such as collection, recording, organisation, storage, use, disclosure, or destruction.

Data Controller: The natural or legal person which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

Data Processor: A natural or legal person which Processes Personal Data on behalf of the Controller.

Data Subject: The identifiable natural person to whom Personal Data relates.

PDPA: The Personal Data Protection Act, No. 9 of 2022 of Sri Lanka.

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DIMO (Private) Limited • No. 65, Jethawana Road, Colombo 14, Sri Lanka
Company Registration: PQ 146 • DPO@dimolanka.com • +94-11-2449797