

Homecore – Privacy Policy

Website, mobile application and connected hardware

Version 1.2 · Published 27 August 2026 · Updated 27 August 2026

English translation – the Swedish version prevails

This document is an English translation of Pytronic AB's privacy policy for Homecore, "Homecore – Integritetspolicy", version 1.2 of 27 August 2026, and is provided for information purposes only. Only the Swedish version is legally binding. In the event of any discrepancy or difference of interpretation between the English and the Swedish text, the Swedish text shall prevail. The Swedish version is available at pytronic.com/legal/integritetspolicy.

Detta dokument är en engelsk översättning av Pytronic AB:s integritetspolicy för Homecore, "Homecore – Integritetspolicy", version 1.2 av den 27 augusti 2026, och tillhandahålls endast för information. Endast den svenska versionen är rättsligt bindande. Vid avvikelser eller skillnader i tolkning mellan den engelska och den svenska texten gäller den svenska texten.

1. Introduction

Pytronic AB ("Pytronic", "we", "us") cares about your personal privacy. This privacy policy explains how we collect, process and protect your personal data when you use Homecore – Pytronic's energy management system for homeowners – including the pytronic.com website, the associated mobile application and connected hardware.

The policy also describes the rights you have and how you can exercise them. Please read this policy carefully so that you understand how and why Pytronic processes your personal data.

You create your cloud account yourself, either in the app or at home.pytronic.com. The account for the Optimisation Service is created manually by Pytronic, and access to the Optimisation Service is granted only thereafter. Payment cannot be made in the app. All payment is made via pytronic.com with Stripe as payment service provider.

This policy also applies to you if you have only subscribed to Pytronic's newsletter at pytronic.com, applied to take part in a pre-launch programme or contacted us via the contact form on the website, whether or not you are a customer. See sections 4.9–4.11 for more information.

2. Controller

Pytronic AB is the controller of the personal data processed in connection with the Homecore system.

Field	Value
Company	Pytronic AB
Company registration number	559104-1107
VAT number	SE559104110701
Address	Speditionsvägen 36, 142 50 Skogås, Sweden
Contact – all matters	info@pytronic.com · +46 8 735 3325
Supervisory authority	Integritetsskyddsmyndigheten (IMY) – the Swedish Authority for Privacy Protection, Box 8114, 104 20 Stockholm – imy.se

Pytronic AB has not appointed a data protection officer (DPO), as the business is not covered by the requirements of Article 37 of the GDPR. All questions concerning the processing of personal data should be sent to info@pytronic.com.

3. Our service and why data is collected

Homecore is an energy management system whose hardware is installed by a certified installer. The system connects to existing appliances – heat pump, EV charger and white goods – and automatically optimises energy use in order to reduce capacity charges and electricity costs. The automatic optimisation is included in the subscription service Homecore Optimizing (the “Optimisation Service”).

Homecore is a data-intensive system. Optimisation requires ongoing information about the property’s energy flows, the status of the appliances and external conditions such as current electricity prices and temperature forecasts. This includes operational data at a detailed time resolution (down to second level) so that the system can respond correctly and safely to rapid changes in energy flows, as well as ongoing algorithm calibration (pseudonymised) so that the service’s forecasts and optimisation can be improved over time. Without this data collection, Homecore cannot deliver the Optimisation Service.

This is how the app communicates with the hardware. When your phone is connected to the same local network as the Homecore Gateway, the Homecore App communicates directly with the Gateway over your home network. When you are outside the home network, both readings and control instead take place through Pytronic’s cloud service. That option requires an active subscription to Homecore Optimizing – without a subscription, the Gateway is not accessible outside your home network.

The data collection described in sections 5–6 is necessary in order for the Optimisation Service to be delivered. If you request that the processing cease, this means that the subscription is terminated. See section 8 for information about your rights.

4. What personal data is collected

4.1 Identification and contact details

Name, email address, home address and telephone number. This data is registered when you apply for an account via pytronic.com.

4.2 Property and installation data

Information about the property where Homecore is connected: living area, heating system, heat pump model, any solar panels, electric vehicle and other major energy loads. This data is necessary in order to calibrate the system.

4.3 Historical consumption and tariff data

Electricity consumption over the past twelve months, current electricity contract, grid tariff structure and electricity grid operator. The data may be provided directly by you or obtained from the electricity grid operator under a power of attorney granted by you. Homecore uses a Homecore Energy Meter connected to the HAN/P1 port of the property's electricity meter for ongoing collection of consumption data. Activation of the HAN port may require you to request this from your electricity grid operator.

4.4 Operational data from the Homecore Gateway and connected appliances

Ongoing data from the Homecore Gateway: power demand, energy consumption, appliance status, outgoing control commands, system events and error messages. Measurement takes place locally at second level. Raw data at second and minute level is transferred to and stored in Pytronic's cloud service in order to enable correct optimisation, troubleshooting and ongoing improvement of the system's algorithms (pseudonymised). The ongoing transfer takes place for as long as you have an active subscription to Homecore Optimizing. Without an active subscription, no operational data is transferred to Pytronic on an ongoing basis – see section 4.13. See sections 5 and 6 for legal basis and retention period.

4.5 Contextual data (external data sources)

Current spot prices from Nordpool per 15 minutes and temperature forecasts from a weather API. This data is public and does not constitute personal data in itself, but is combined with your energy data for optimisation purposes.

4.6 Comfort data

Indoor temperature in relevant zones, the desired temperature you have set and manual changes to the control schedule. Any voluntary comfort reports submitted by you in the app.

4.7 Technical app data

Operating system, device information, version data, performance data and crash reports. Used to ensure the technical stability of the app. This data relates to the app and is processed to the extent that you use the Homecore App, whether or not you have an active subscription.

4.8 Customer satisfaction data (voluntary)

Responses to voluntary surveys about the savings and comfort you experience. Provided only if you actively choose to respond.

4.9 Email address when subscribing to the newsletter

If you subscribe to Pytronic's newsletter at pytronic.com, you provide your email address. This is entirely separate from any customer account – anyone may subscribe, whether or not they are a customer of Pytronic. Subscription takes place via a form on the website, and your email address is disclosed to Mailchimp only once you have actively submitted the form. The email address is used solely to send the newsletter and is processed by

Pytronic's newsletter provider Mailchimp (The Rocket Science Group LLC d/b/a Mailchimp). See sections 5, 6 and 7 for legal basis, retention period and information about the transfer to Mailchimp in the USA.

4.10 Data provided when applying to a pre-launch programme

If you apply to take part in one of Pytronic's pre-launch programmes, you provide your name, telephone number, email address and postcode, together with details of your home and your energy installation – type of dwelling, heat pump, electric vehicle, solar panels and type of electricity contract – as well as any free text you choose to write yourself. The data is used to assess whether Homecore is technically compatible with your property and to contact you about your application. Applying is not binding and does not involve any purchase. If the application does not lead to an agreement, the data is erased no later than twelve months after it was submitted.

4.11 Data provided via the contact form

If you contact us via the form at pytronic.com, you provide your name, telephone number, email address and the message you write yourself. The data is used solely to answer your enquiry and to enable follow-up of the matter. Please do not enter sensitive personal data, such as health data, in the message field.

4.12 Data in connection with protection against automated spam

In order to protect the website's forms against bots and automated spam, Pytronic uses bot protection that does not place any cookies in your browser.

4.13 Processing when you do not have an active subscription

You may own Homecore hardware without having an active subscription to Homecore Optimizing. This section describes the processing that takes place in that situation.

Without an active subscription, no operational data is transferred from the Homecore Gateway to Pytronic on an ongoing basis. No automatic optimisation is performed, your energy use is not displayed in the Homecore App, and the Gateway is not accessible outside your home network. In that case, the Homecore App communicates only directly with the Gateway over your local network, so that you can control your connected appliances manually.

What continues to be processed is your identification and contact details under 4.1, to the extent and for the period stated in section 6, and technical app data under 4.7 to the extent that you use the app.

We will inform you by email when a software update for your hardware becomes available. We do so in order to fulfil the undertaking in the Terms of Purchase, section 8.3, and the obligation under Chapter 4, Section 4 of the Swedish Consumer Sales Act (konsumentköplagen (2022:260)) to provide information about and supply updates. Push notifications are not used for this purpose, since push requires an active subscription. The purpose, legal basis and retention period are set out in sections 5 and 6.

[TO BE COMPLETED BEFORE PUBLICATION: if the Homecore Gateway makes any outbound contact with Pytronic even without an active subscription – for example for time synchronisation, version checking or error reporting – that processing must be described here, with purpose, data categories, legal basis and retention period. This has not yet been determined.]

5. Why we process your personal data – purposes and legal basis

Pytronic processes your personal data only where there is a clear purpose and a legal basis under Article 6 of the GDPR.

Purpose	Data categories	Legal basis	Retention period
Registration and activation of the Homecore system	Contact details, property data, historical consumption data	Performance of a contract (Art. 6(1)(b))	Term of the agreement + 36 months*
Ongoing optimisation of energy use, including operational data at second/minute level (requires an active subscription)	Operational data (incl. raw data at second/minute level), contextual data, comfort data	Performance of a contract (Art. 6(1)(b))	90 days (raw data) / 24 months (aggregated)
Calculation and display of your energy use and savings in the app (requires an active subscription)	Savings and control data, historical data	Performance of a contract (Art. 6(1)(b))	Term of the agreement + 24 months
Customer support and troubleshooting	Contact details, operational data, technical data	Performance of a contract (Art. 6(1)(b))	12 months
Troubleshooting of connectivity, data communication and network security	Access logs, detailed connection and communication data	Legitimate interests (Art. 6(1)(f))	12 months
Ensuring the technical function and stability of the app	Technical app data, crash reports	Performance of a contract (Art. 6(1)(b))	12 months
Operational push notifications in the app (alarms, anomalies, system status) – requires an active subscription	Push token, notification content	Performance of a contract (Art. 6(1)(b))	For the duration of the subscription
Information about available software updates for the hardware, to customers without an active subscription	Identification and contact details (email address)	Legal obligation (Art. 6(1)(c)) – Chapter 4, Section 4 of the Swedish Consumer Sales Act	For the duration of the update undertaking, at least 3 years from completed installation
Analysis and improvement of algorithms (pseudonymised)	Operational data (pseudonymised)	Performance of a contract (Art. 6(1)(b))	Per model version
Customer satisfaction surveys (voluntary)	Satisfaction data (pseudonymised)	Legitimate interests (Art. 6(1)(f))	24 months
Sending of newsletters	Email address (separate from customer account)	Consent (Art. 6(1)(a))	Until consent is withdrawn
Handling and compatibility assessment of applications to pre-launch programmes	Contact details, dwelling and installation data	Steps taken at your request prior to entering into a contract (Art. 6(1)(b))	If an agreement is concluded: becomes customer data. If not: 12 months
Booking and carrying out the installation in your home	Contact details, dwelling and installation data	Performance of a contract (Art. 6(1)(b))	Erased by the engaged installer once the assignment is completed
Responding to enquiries submitted via the contact form	Name, telephone number, email address, content of the message	Legitimate interests (Art. 6(1)(f))	24 months
Protection of the website's forms against bots and automated spam	N/A	Legitimate interests (Art. 6(1)(f))	N/A

*) Contact details and account data are retained to the extent required by the Swedish Bookkeeping Act (7 years for accounting information).

Pytronic does not process your personal data for marketing purposes, for profiling for advertising purposes, or in order to share your data with third parties for commercial purposes – with the exception of newsletters sent to you if you have actively subscribed to them in accordance with section 4.9. You can always unsubscribe from the newsletter.

6. Retention periods

Pytronic retains your personal data for as long as is necessary for the purposes described in this policy, or for as long as is required by law.

Data category	Retention period
Aggregated operational data (hourly values)	24 months
Raw data (second/minute level)	90 days
Access logs and connection diagnostics	12 months
Property and installation data	Term of the agreement + 12 months
Historical consumption data	Term of the agreement + 24 months
Comfort data	12 months (rolling)
Customer satisfaction data	24 months
Technical app data and crash reports	12 months
Data used to provide information about software updates	For the duration of the update undertaking – at least 3 years from completed installation (Terms of Purchase, section 8.3)
Contact details and account data	Term of the agreement + 36 months (accounting requirement: 7 years)
Anonymised aggregated statistics	Indefinite (not personal data)
Email address from newsletter subscription	Until consent is withdrawn (unsubscribe)
Application data (pre-launch programme)	12 months if the application does not lead to an agreement
Messages submitted via the contact form	24 months
Data held by an engaged installer	Erased once the assignment is completed, in accordance with the data processing agreement
Data for bot protection	N/A

Erasure is carried out manually and is logged. Confirmation is sent by email to the data subject.

7. Third parties and processors

7.1 Processors

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Pytronic AB, reg. no. 559104-1107 · pytronic.com/legal/integritetspolicy

English translation – only the Swedish version is legally binding

Pytronic engages external suppliers that process personal data on our behalf. These suppliers may process the data only for the purposes specified by Pytronic. A data processing agreement has been concluded with all such suppliers.

Category	Status
Cloud infrastructure and data storage	AWS (Amazon Web Services), Frankfurt, Germany (eu-central-1). Data processing agreement concluded. EU/EEA-compliant.
Operation of the pytronic.com website	Data submitted via the contact and application forms on the website is stored with the website's hosting provider. Data processing agreement concluded.
Protection against bots and spam in web forms	N/A
Analytics and crash reporting (app)	No external supplier is used. Crash reports and technical app data are processed in Pytronic's own environment.
Transactional email (consent confirmations, information about software updates)	Handled manually by Pytronic from info@pytronic.com. No external supplier is used. This is the channel used to inform customers without an active subscription about software updates, see section 4.13.
Payment processing (via pytronic.com)	Stripe (Stripe Payment Link). Data processing agreement concluded. See also the note below regarding Stripe's own purposes.
Nordpool API (spot prices)	Active – public data, not personal data
Weather API (temperature forecasts)	Active – public data, not personal data
Newsletter distribution	Mailchimp (The Rocket Science Group LLC d/b/a Mailchimp, USA). Data processing agreement concluded.
Installation in your home	Certified installation companies engaged by Pytronic. Data processing agreement concluded. See section 7.4.
Push notifications	Apple Push Notification Service (Apple Inc., USA) and Google Firebase Cloud Messaging (Google LLC, USA). Used solely for operational notifications (alarms, anomalies, system status). Push requires an active subscription to Homecore Optimizing. Customers without a subscription are informed by email instead, see section 4.13.

The Homecore App is distributed via the Apple App Store and Google Play. In that context, Apple and Google process data relating to downloading and installation as independent controllers under their own privacy policies.

Stripe also processes certain data as an independent controller – among other things in order to fulfil its own obligations relating to fraud prevention and financial regulatory compliance. Stripe's own privacy policy applies to that processing.

7.2 International transfers

Pytronic's cloud infrastructure is located within the EU/EEA (AWS Frankfurt, eu-central-1). For payment processing, Pytronic engages Stripe (Stripe Technology Company, Limited, Ireland). Stripe may transfer personal data to the USA, which takes place on the basis of the EU–U.S. Data Privacy Framework and the European Commission's standard contractual clauses. For sending newsletters to you if you have subscribed to them, Pytronic engages Mailchimp (The Rocket Science Group LLC d/b/a Mailchimp, USA). Mailchimp likewise transfers personal data to the USA, on the basis of the EU–U.S. Data Privacy Framework and standard contractual clauses in the corresponding manner. For push notifications, Pytronic engages Apple Push Notification Service (Apple Inc., USA) and Google Firebase Cloud Messaging (Google LLC, USA). Both suppliers transfer limited data to the USA on

the basis of the EU–U.S. Data Privacy Framework and standard contractual clauses. For other suppliers that process personal data outside the EU/EEA, Pytronic ensures that appropriate safeguards are in place, normally by means of standard contractual clauses. Further information about how Stripe and Mailchimp respectively handle personal data is available at stripe.com/privacy and mailchimp.com/legal/privacy.

Pytronic continuously monitors developments concerning the EU–U.S. Data Privacy Framework. Should the framework cease to apply, the transfers will continue to rest on standard contractual clauses.

7.3 Public authorities

Pytronic may disclose personal data to public authorities where this is required by law or following a legal request.

7.4 Installers

Homecore is installed in your home, either by Pytronic's own staff or by a certified installation company engaged by Pytronic. In order for the installation to be booked and carried out, we disclose your name, your address, your telephone number and the data about your home and energy installation that is needed for the work. We do not disclose your consumption history, your payment details or operational data from Homecore.

Engaged installation companies are processors for Pytronic and may process the data solely in order to carry out the installation. A data processing agreement has been concluded with all engaged installers, and the data must be erased once the assignment is completed.

You will be told which company will carry out your installation no later than when the appointment is booked. If you yourself enter into a separate agreement with an installer, that company processes your data as an independent controller under its own privacy policy.

If you grant a power of attorney enabling us to obtain your consumption history under section 4.3, your identity is disclosed to your electricity grid operator in connection with that request.

8. Your rights

You have a number of rights in relation to your personal data under the GDPR. All requests are handled manually by Pytronic and are logged. We respond to requests within 30 days.

Right	What it means	How to exercise it
Right of access (Art. 15)	You have the right to obtain confirmation as to whether Pytronic processes personal data concerning you, and to receive a copy of that data.	Send an email to info@pytronic.com with the subject line "Subject access request"
Right to rectification (Art. 16)	You have the right to have inaccurate data rectified and incomplete data completed.	Contact info@pytronic.com
Right to erasure (Art. 17)	You have the right to request that your personal data be erased, for example where it is no longer needed for its purpose. Please note that erasure of account-linked data means that the Optimisation Service is terminated.	Contact info@pytronic.com with the subject line "Erasure"
Right to restriction of processing (Art. 18)	You have the right to request that the processing of your data be restricted in certain circumstances.	Contact info@pytronic.com

Right	What it means	How to exercise it
Right to data portability (Art. 20)	You have the right to receive the data you have provided to Pytronic in a machine-readable format.	Contact info@pytronic.com with the subject line "Data export"
Right to object (Art. 21)	You have the right to object to processing based on legitimate interests.	Contact info@pytronic.com with the subject line "Objection"
Right to withdraw consent (Art. 7(3))	Withdrawal does not affect the lawfulness of processing carried out before the withdrawal. You can unsubscribe from the newsletter at any time.	Contact info@pytronic.com or use the unsubscribe link in the newsletter

If you are not satisfied with Pytronic's handling of your personal data, you have the right to lodge a complaint with Integritetsskyddsmyndigheten (IMY), the Swedish Authority for Privacy Protection, or with another competent supervisory authority.

Authority	Contact
Integritetsskyddsmyndigheten (IMY) – the Swedish Authority for Privacy Protection	Box 8114, 104 20 Stockholm, Sweden · imy.se · imy@imy.se · +46 8 657 61 00

9. Technical and organisational security measures

Pytronic applies technical and organisational security measures to protect your personal data against unauthorised access, alteration, disclosure or destruction, in accordance with Article 32 of the GDPR.

Control	Status
TLS 1.3 for all communication	No fallback to older versions
Unique device certificates	Each Homecore Gateway has a unique certificate
Certificate pinning	The Homecore Gateway accepts connections only to Pytronic's own backend, which prevents interception of the communication.
Pseudonymisation	All operational data is tagged with a Customer ID (HCR-NNNN). The key table is held on an internal server, accessible only to a limited number of named, authorised employees.
Encryption at rest (AES-256)	AWS standard (AES-256), covered by the data processing agreement concluded.
Role-based access control (RBAC)	Access to personal data is restricted on the basis of each employee's duties.
Limited disclosure to installers	Engaged installers receive only the data fields needed for the assignment. Technical documentation is labelled with the Customer ID instead of the name wherever possible.
Protection against bots in web forms	The contact and application forms are protected against automated spam and misuse. The protection is loaded only on the pages that contain forms and places no cookies. See section 4.12.
MFA for internal production access	Access to systems containing personal data requires multi-factor authentication (MFA), where log-in is confirmed with both a password and a second factor.

Control	Status
Incident handling and notification to IMY	Notification to IMY within 72 hours where there is a risk to the rights of data subjects.
Authentication app-cloud service (OAuth 2.0 / JWT)	The app's communication with the cloud service uses OAuth 2.0 with time-limited JWT tokens. Tokens can be revoked where necessary.
<i>In the event of a personal data breach that entails a risk to the data subject's rights, Pytronic notifies the breach to IMY within 72 hours in accordance with Article 33 of the GDPR.</i>	

10. Contact information

For questions about Pytronic's processing of personal data, to exercise your rights or to submit a complaint:

Field	Value
All matters	info@pytronic.com
Telephone	+46 8 735 3325
Website	pytronic.com
Postal address	Pytronic AB, Speditionsvägen 36, 142 50 Skogås, Sweden

A single contact address (info@pytronic.com) is used for all customer and data protection enquiries. Internal handling is performed manually.

11. Cookies

Pytronic uses cookies on the pytronic.com website. Which cookies are used, their purpose and their lifetime are described in our cookie policy at pytronic.com/cookies/.

The protection against bots and spam on our form pages sets no cookies. See section 4.12.

12. Changes to this privacy policy

Pytronic reserves the right to update this privacy policy where warranted, for example as a result of changes to the service, new legislation or regulatory requirements. The latest version is always published at pytronic.com and is available in the app.

In the event of material changes, you will be informed by email with sufficient advance notice. The date of the latest change is always stated in the document header.