

Privacy policy Zamel Sp. z o.o.

Effective Date: 20.06.2023

Updated: 20.06.2023

Zamel Sp. z o.o. and subsidiaries (“we”, “us”, “our”, “Zamel Sp. z o.o.”) are committed to protecting your privacy. This Privacy Policy (“Policy”) describes our practices in connection with information privacy on Personal Data we process through your individual use of the following services, products, and related mobile applications (collectively, the “Products”):

·NaviHome Mobile Application

Before you use our Products, please carefully read through this Policy and understand our purposes and practices of collection, processing of your Personal Data, including how we use, store, share and transfer Personal Data. In the Policy you will also find ways to execute your rights of access, update, delete or protect your Personal Data.

When you accept this Policy when you register with your Personal Data, or if you start to use our Products and does not expressly object to the contents of this Policy, we will consider that you fully understand and agree with this Policy. If you have any question r regarding this Policy, please do not hesitate to contact us via:

odo@zamel.pl

For other branded mobile applications powered by Zamel Sp. z o.o., our Clients control all the Personal Data collected through our Products. We collect the information under the direction of our Clients and the processing of such information shall be limited to the purpose of providing the service for which our Clients has engaged us. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly.

Definition

In this Policy, Personal Data means information generated, collected, recorded and/or stored, electronically or otherwise, that can be used to identify an individual or reflect the activity of an individual, either from that information alone, or from that information and other information we have access to about that individual.

Personal Sensitive Data includes personal biometric information, communication records and contents, health information, transaction information, and precise location information. When we collect Personal Sensitive Data from you, we will generate an explicit notification for your consent before we collection personal sensitive data about you.

Smart Devices refers to those computing devices produced or manufactured by hardware manufacturers, with human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, smart wearable devices, smart air cleaning devices, etc.

Apps refers to those mobile applications developed by Zamel Sp. z o.o. that provide end users remote control to Smart Devices and with the ability to connect to the supplier IoT Platform.

What Personal Data do we collect

In order to provide our services to you, we will ask you to provide necessary Personal Data that is required to provide those services. If you do not provide your Personal Data, we may not be able to provide you with our products or services.

1. Information You Voluntarily Provide Us

·Registered Account Data: When you register an account with us, we may collect your name and contact details, such as your email address, phone number, user name, and login credentials. During your interaction with our Products, we may further collect your nickname, profile picture, country code, language preference or time zone information into your account.

If you authorize login to the Products with a third party account, we will obtain from such third party your account information (such as portrait, nickname, region, gender, etc.) which may be bound with your Zamel Sp. z o.o. account for quick login. We will ensure compliance with applicable data protection laws and regulations, as well as agreements, policies or documentations agreed with such third party regarding sharing personal information, in processing your Personal Data.

·Non-registered Account: If you do not want to provide your account data when you start to use any of the Services, you may use the App without logging in or creating an account, namely the "Try Now" mode, and you may still use certain Services, such as searching and browsing any features on the App by creating a guest ID. When you are using the "Try Now" mode, we will not collect Personal Data related to your account.

Collection and use of the Personal Data collected here will be limited to: the time of entering the App, operating system of your mobile phone, and the purposes you have authorized in using the additional functions of the App and/or the Smart Devices. For instance, if you enable the location setting in the "Try Now" mode, the location data will be uploaded for supporting the function. Once you exit from the "Try Now" mode, we will remove your data instantly and permanently.

However, if the Services you request or purchase are based on your account, please go to the registration/login page for guidance.

Feedback: When using feedback and suggestion features in our Products, we will collect your email address, mobile phone number and your feedback content to address your problems and solve device failures on a timely basis.

Information based on additional functions:

Confirm: the system permissions that allow in the your App

In order to offer you with more convenient and higher-quality Services with optimized user experiences, we may collect and use certain information if you consent to use additional functions in the App. Please note, if you do not provide such information, you may continue to use basic Services of the App and connected Smart Devices, but certain features based on these additional functions may not be available. These additional functions may include:

1)Additional functions based on location information:

When you enable the location-based functions through permission settings on your mobile device, we will collect and process your location information to enable these functions, such as pairing with your Smart Devices. Also, we may collect information about your: a) real-time and precise location, for instance when you choose to use the automation scenarios for controlling your Smart Devices, or b) non-precise geo-location when you use certain Smart Devices or the Services, such as robot cleaner and weather service.

Based on your consent, when you enable the geo-fence feature, your location information will be generated and shared with Google Maps services. Please note that Google has corresponding data protection measures, which you may refer to Google's Data Processing and Security Terms for more details.

You may disable the collection and use of your location information by changing your mobile device settings ("My - Setting - Privacy Right Setting - Switch on/off Location Information"), upon which we will cease to collect and use your location information.

2)Additional services based on camera:

You may use the camera to scan the code by turning on the camera permission to pair with a Smart Device, take video, etc. Please be aware that even if you have agreed to enable the camera permission, we will only obtain information when you actively use the camera for scanning codes, video recording, etc.

You may opt-out the using of camera permission: "My - Setting - Privacy Right Setting - Switch on/off Camera".

3)Additional services for accessing and uploading pictures/videos based on photo albums (picture library/video library):

You can use this function to upload your photos/pictures/videos after turning on the photo album permission, so as to realize functions such as changing the avatar, reporting device usage problems by providing photo proofs, etc.. When you use the photos and other functions, we will not recognize this information; but when you report a device usage problem, we may use the photos/pictures you upload to locate your problem.

You may opt-out the using of photo album permission: "My - Setting - Privacy Right Setting - Switch on/off Photo Album".

4)Additional services related to microphone-based service:

You can use the microphone to send voice information after turning on the microphone permission, such as shooting videos, waking up the voice assistant, etc. For these functions, we will collect your voice information to recognize your command. Please be aware that even if you have agreed to enable the microphone permission, we will only obtain voice information through the microphone when you voluntarily activate the microphone in the App.

You may opt-out the using of microphone permission: "My - Setting - Privacy Right Setting - Switch on/off Microphone".

5)Additional services based on storage permission(Android):

The purpose is to ensure the stable operation of the App by utilizing the storage permission. After you give or indicate the permission to read/write your mobile

device's storage, we will access pictures, files, crash log information and other necessary information from your mobile device's storage to provide you with functions, such as information publications, or record the crash log information locally.

You may opt-out the using of storage permission: "My - Setting - Privacy Right Setting - Switch on/off Storage".

6) Additional services based on Notification permission:

The reason why we ask you for the permission is to send you notifications about using the Smart Devices or Services, especially if you have purchased security services and you require an alert or message so that you can capture the real-time status.

You may opt-out the using of App notifications: "My - Message Center - Setting - Switch on/off Notifications".

7) Additional services based on Alert Window permission :

You may choose to bind a camera in the App and require the App to display the real-time image of the camera in a separate window.

You may opt-out the using of alert window information: "My - Setting - Privacy Right Setting - Switch on/off Alert Window".

8) Additional services based on Bluetooth permission:

You can enable Bluetooth functions after turning on the permission, including controlling the Smart Devices, acquiring status of, discovering and configuring Smart Devices. In these functions, we will communicate with Smart Devices via Bluetooth. Please be aware that even if you have agreed to enable the Bluetooth permission, we will only use Bluetooth for communication in these scenarios: display device status on the home page and Smart Device panel; perform device control on the home page and Smart Device panel; discovering Smart Devices on the home page and the add device page, Smart Device distribution network.

You may opt-out the using of Bluetooth via "My - Settings - Privacy Setting - Disable/Enable Bluetooth permission".

9) Additional services based on HomeKit permission (iOS):

You can enable related functions after enabling HomeKit permissions, including discovering Smart Devices, enabling Smart Device network configuration, controlling Smart Devices, and checking device status. Among these functions, we will process data with the "Home" App that comes with the iOS system through HomeKit. Please be

aware that even if you have agreed to enable the HomeKit permission, we will only use it in these scenarios: on the home page, to discover HomeKit devices, HomeKit device network configuration; in "Settings - HomeKit" for discovering HomeKit devices, HomeKit device network configuration.

You may opt-out the using of HomeKit permission via "My - Settings - Privacy Settings-Turn off/on HomeKit permission".

10) Additional services based on HealthKit (iOS):

You can proactively enable related functions after enabling HealthKit permission, including statistics on weight, height, running, and swimming. In these functions, we will exchange data with the health-related functionalities that comes with the iOS system through HealthKit. Please be aware that even if you have agreed to enable HealthKit permission, we will only use them in these scenarios: when you use the health-related Smart Device, such as body fat scales, bracelets, watch and consent to use the HealthKit, the data reported by the Smart Device will be transferred to HealthKit.

You may opt-out the using of HealthKit permission via "My - Settings - Privacy Settings - Turn off/on HealthKit permission".

Please note that if you turn on any permission, you authorize us to collect and use relevant personal information to provide you with corresponding Services. Once you turn off any permission, we will take it as canceling the authorization, and we will no longer continue to collect Personal Data based on the corresponding permissions, and the related functions may be terminated. However, your decision to turn off the permission will not affect the previous collection and use of information based on your authorization.

2.Information We Collect Automatically

Mobile Device Information: When you interact with our Services, in order to provide and maintain the normal operation of our Services, to improve and optimize our Services, and to protect your account security as well, we automatically collect mobile device information, such as mobile device model number, IP address, wireless connection information, the type and version of the operating system, application version number, push notification identifier, log files, and mobile network information. Meanwhile, we will collect your software version number. In order to ensure the security of the operating environment or to provide services, we will collect information about the installed mobile applications and other software you use.

Usage Data: During your interaction with our websites and Services, we automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our websites and Services.

Log Information: When you use the App, in order to improve your user experience, the system and exception log may be uploaded, including your IP address, language preference setting, operating system version, date or time of access, so that we can facilitate and accurately identify problems and help you solve them in timely manner.

Please note that we cannot identify a specific individual by using device information or log information alone. However, if these types of non-personal information, combined with other information, may be used to identify a specific individual, such information will be treated as Personal Data. Unless we have obtained your consent or unless otherwise provided by data protection laws and regulations, we will aggregate or desensitize such information..

3.Smart Devices Related Information:

Basic Information of Smart Devices: When you connect your Smart Devices with the Services, we may collect basic information about your Smart Devices such as device name, device ID, online status, activation time, firmware version, and upgrade information.

Information collected during the process of connecting to a Smart Device: Based on the type of Smart Device you need to connect, the basic information collected includes: Wi-Fi information, device MAC address, etc.

Information Reported by Smart Devices: Depending on the different Smart Devices you elect to connect with our Products or Services, we may collect different information reported by your Smart Devices. For example, **Please enter information about the smart device report.**

Please note that when you actively agree to enter the App name and the application is connected to the Apple Health, we will share your measurement data with Apple Health (including only your BMI, height, weight and body fat% data). The purpose of sharing data is only to measure and analyze health-related indicators related to you, and it will never be disclosed to other third parties. You can close at any time by managing the HealthKit settings page.

Purposes and legal basis for processing Personal Data

The purpose for which we may process information about you are as follows:

·Provide You with Our Services: We process your account data, mobile device information, usage data, location information, and Smart Device related information to provide you with the Services that you have requested. The legal basis for this processing is to perform our contract with you according to user agreement.

·Improve Our Services: We process your mobile device information, usage data, location information and Smart Device related information to ensure the functions and safety of the Services, to develop and improve the Services, to analyze the efficiency of our operations and to prevent and trace fraudulent or inappropriate usage. The legal basis for this processing is to perform our contract with you according to our user agreement.

·Non-marketing Communication: We process your Personal Data to send you important information regarding the Services, changes to our terms, conditions, and policies and/or other administrative information. At the same time, we will also send you notifications related to the services you have purchased, such as alert services. You can check the "App Notification" in the App ("Me &rt; Message Center &rt; Setting &rt; Notification Setting") to manage these communications. When you decide not to enable the Notifications function, we will no longer process your information for such purpose. The legal basis for this processing is to perform our contract with you according to our user agreement.

·Data Analysis: In order to analyze the usage of the products we provide and improve your user experience, we will analyze the data you provide us, a) we need to check your problems when you encounter any malfunctions during the usage of the product, under such circumstance, you may not able to opt-out because it is highly relate to your functionalities and quality of using our product and service, and b) analyze data about how you interface with the product or under particular scenarios so that you can better enjoy the convenience brought by our Services, under such circumstance, if you do not agree to data analysis of your data, you can enter the privacy settings of App ("My &rt; Settings &rt; Privacy Settings &rt; Data Analysis") to opt-out your selection. The legal basis for such processing is based on your consent.

·Marketing Communication and Personalization: We may process your account data, usage data, device information to personalize product design and to provide you with services tailored for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of the Services. If you do not allow us to process your Personal Data for personalization, you may opt out when you enter the App, or by

changing your preferences in "Privacy Settings" ("Me&rt; Settings &rt; Privacy Settings &rt; Personalization") in the App. The legal basis for this processing is your consent.

·**Legal Compliance.** We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

·comply with a legal obligation, process or request;

·enforce our User Agreement and other agreements, policies, and standards, including investigation of any potential violation thereof;

·protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law; or

·detect, prevent or otherwise address security, fraud or technical issues.

If there is any change in the purposes for processing your personal data, we will inform such change to you via email and/or a prominent notice on our website of such changes of purposes, and choices you may have regarding your Personal Data.

Who do we Share Personal Data with?

At Zamel Sp. z o.o., we only share Personal Data in ways that we tell you about. We may share your Personal Data with the following recipients:

·To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.

·To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices, and/or networks and systems through which you access and use our websites and Services.

·To subsidiaries or affiliates within our corporate family for purpose of regular business activities based on our instructions and in compliance with applicable law, this Policy and other appropriate confidentiality and security measures.

·To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, and choices you may have regarding your Personal Data.

·As we believe in good faith that access to, or use, preservation, or disclosure of the information is reasonably necessary or appropriate to:

(a) Comply with applicable law, regulation, legal process, or lawful governmental request;

(b) Enforce our User Agreement and other agreements, policies, and standards, including investigation of any potential violation thereof;

(c) Protect our operation and business systems;

(d) Protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law; or

(e) Perform risk management, screening and checks for unlawful, fraudulent, deceptive or malicious activities.

Except for the third parties mentioned above, we only disclose your Personal Data to other third parties with your consent.

International Transfer of Information Collected

Zamel Sp. z o.o. will comply with applicable data localization requirements in corresponding jurisdictions with respect to storage of data. To facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live. Laws in these countries may differ from the laws applicable to your country of residence. When we do so, we will ensure that an adequate level of protection is provided for the information by using one or more of the following approaches:

·Agreement on the basis of approved EU standard contractual clauses per GDPR Art. 46. For more information, see https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

If you would like further detail on the safeguards we have in place, you can contact us directly as described in this Privacy Policy.

Your Rights Relating to Your Personal Data

We respect your rights and control over your Personal Data. You may exercise any of the following rights:

Confirm: please provide at least 2 approaches for individual user exercising their privacy rights, for instance, via the privacy office email address; odo@zamel.pl, or via the route of Feedback imbedded in the App: Me&rt;Personal Center&rt;Account and Security&rt;, etc.

You do not have to pay a fee and we will aim to respond you within 30 days. If you decide to email us, in your request, please make clear what information you would like to have changed, whether you would like to have your Personal Data deleted from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

You may:

·Request access to the Personal Data that we process about you: "My-Setting-Privacy Settings-Personal Data Export";

·Request that we correct inaccurate or incomplete Personal Data about you: 1) Modify your account number (email address or phone number): "My-Setting-Account and Security-Change your Account"; 2) Modify the nickname and/or time zone: "My-Personal Information";

·Request deletion of Personal Data about you: "My-Setting-Account and Security-Delete Account", when you confirm the deletion of your account, your Personal Data will be deleted accordingly.

·Request restrictions, temporarily or permanently, on our processing of some or all Personal Data about you: Please send over your request through "My-FAQ & Feedback", or send over the email request to odo@zamel.pl

·Request transfer of Personal Data to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated: Please send over your request through "My-FAQ & Feedback", or send over the email request to odo@zamel.pl Opt-out or object to our use of Personal Data about you where our use is based on your consent or our legitimate interests.

We will exercise your privacy right to withdraw consent through the following approaches:

1) For privacy permissions acquired through device system settings, your consent can be withdrawn by changing device permissions, including: location, camera, photo

album (picture library/video library), microphone, Bluetooth settings, notification settings and other related functions;

2) You may opt-out the non-marketing communication through “Me & Message Center & Notification Settings” to manage your selection;

3) You may opt-out the data analysis features through “Me & Settings & Privacy Settings”;

4) You may opt-out the Personalization feature through “Me & Settings & Privacy Settings & Personalization”;

5) Unbind the Smart Device through the App, and the information related to the Smart Device will not be collected;

6) By using product with the “Try Now” mode, and not enable certain location setting for particular smart scene, we will not collect any Personal Data about you;

7) If you previously agreed to associate App account with a third-party service, such as a health platform, please unbind it on the third-party platform.

When you withdraw your consent or authorization, we may not be able to continue to provide you with certain products or services correspondingly. However, your withdrawal of your consent or authorization will not affect the processing of personal information based on your consent before the withdrawal.

About **Deletion of the Account**: You can find the Delete function through “Me & Settings & Account and Security & Delete Account” (Deactivate Account)

Security Measures

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data. [Zamel Sp. z o.o.](#) provides various security strategies to effectively ensure data security of user and device. As for device access, [Zamel Sp. z o.o.](#) proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization. As for data communication, communication using security algorithms and transmission encryption protocols and commercial level information encryption transmission based on dynamic keys are supported. As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any

account you might have with us has been compromised), you could immediately notify us of the problem by emailing odo@zamel.pl

Data Retention

We process your Personal Data for the minimum period necessary for the purposes set out in this Policy, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period based on the amount, nature, and sensitivity of your Personal Data, and after the retention period ends, we will destruct your Personal Data.

·For as long as you require us to fulfill the products and services you request from us as defined in the user agreement

·Personal Data will no longer be retained when you request to remove your Personal Data, we will accordingly complete the task.

When we are unable to do so for technical reasons, we will ensure that appropriate measures are put in place to prevent any further such use of your Personal Data.

Children's Privacy

Protecting the privacy of young children is especially important to us. The Services are not directed to individuals under the age of thirteen (13) (or such other age provided by applicable law in your country/region of residence), and we request that these individuals do not provide any Personal Data to us. We do not knowingly collect Personal Data from any child unless we first obtain permission from that child's parent or legal guardian. If we become aware that we have collected Personal Data from any child without permission from that child's parent or legal guardian, we will take steps to remove that information..

Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by email (send to the e-mail address specified in your account) or by means of a notice in the mobile applications prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about our practices or this Privacy Policy, please contact us as follows:

Zamel Sp. z o.o.

Postal Mailing Address: Poland, 43-200, Pszczyna, Zielona 27 Street

Email: marketing@zamel.pl