

## Product Privacy Policy

Last modified: June 12, 2024

### 1. Introduction

Puretech Electrical Products Ltd ("Company," "we" or "us") respects your privacy and is committed to protecting it through our compliance with this Product Privacy Policy (the "policy"). This policy describes the types of information we may collect or that you may provide to us when you use product(s) as manufactured by Puretech Electrical Products Ltd. (the "Product") or use service(s) as provided by us or our affiliates (the "Service"), and our practices for collecting, using, maintaining, sharing, protecting and disclosing that information. This policy applies only to information we collect when you use the Product or Service. This Policy does not apply to products or services provided by third party companies or individuals (hereinafter referred to as "Third-Party Services").

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it.

BY ACCEPTING THIS POLICY AND THE TERMS OF USE OR USING OR ACCESSING THE PRODUCT OR SERVICE, YOU (A) ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTAND THIS POLICY AND THE TERMS OF USE; (B) REPRESENT THAT YOU ARE 16 YEARS OF AGE (OR THE YOUNGEST AGE THAT APPLICABLE LAWS PROVIDE FOR AN ADULT) OR OLDER (COLLECTIVELY REFERRED AS APPLICABLE AGE); AND (C) ACCEPT AND AGREE THAT YOU ARE LEGALLY BOUND BY THIS POLICY AND THE TERMS OF USE. IF YOU DO NOT AGREE TO THIS POLICY OR THE TERMS OF USE, DO NOT ACCESS OR USE THE PRODUCT OR SERVICE.

We may modify this Policy from time to time (see "Changes to Our Policy" below).

### 2. Children under Applicable Age:

the product is not intended for children under 16 years of age, and we do not knowingly collect personal data from children under 16. If we learn we have collected or received personal data from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16 (or the youngest age that applicable laws provide for an adult), please contact us at [DPO@puretechsecurity.co.uk](mailto:DPO@puretechsecurity.co.uk)

### 3. Information We Collect, Purposes of Processing and Legal Grounds

We collect information from and about users of the Product or Service:

Directly from you when you provide it to us, and/or;  
Automatically when you use the Product or service or specific functions of the Product or Service.

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We try to ensure that we only collect and hold personal data that we need for the product or service we are offering to you.

Therefore, unless otherwise indicated in the below, the provision of personal data is a requirement for us to enter into a contract with you or fulfill our contractual obligations. In case

that you choose not to provide certain information, you might not be able to take advantage of our product or Service in full or partially.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground (contact details at end of document), we are relying on to process your personal data where more than one ground has been set out below.

a. When you request password reset, we will collect your product device details (this may include serial number or device ID) and email address, the purpose of which is to allow us to complete your request for password reset. Refusing to provide such information may only result in your being unable to reset the password but does not affect your normal use of the Product or Service. The lawful basis for our processing is the performance of contract for the Terms of Use, and our legitimate interests to maintain our requirements of the contractual relationship with you, provide you with services in accordance with the legal requirements of the country/region you have chosen, allow you use the Product or Service features as described in the user guide, to develop our business and ensure security of Product and that your use of our Product or Service are in compliance with the accepted terms and conditions.

b. When you use the function of online update, we will collect your Product serial number. When you trigger the function of online update, you give us your consent to collect such information and enable us to provide accurate upgraded firmware package information for the product. Refusing to provide such information may result in your being unable to use online update function but does not affect your normal use of the Product or Service. The lawful basis for our processing is your consent.

c. When you use P2P service, which permits your product connecting with the network and enables you to remotely manage the product, we will process the product's information or your personal information when necessary, such as IP address, MAC address, and Product serial number. The lawful basis for our processing is your consent. If you use P2P Service in our storage products, or data communication products, including switch, router, bridge, AP (wireless access point) /AC (wireless access controller), which are used for transferring network data package, supporting the access of storage products, network cameras and other network products, we may process certain information, including IP address, MAC address, and Product serial number of the products connected with your Product in order to facilitate your management of the connected products. You need to ensure that you have obtained consent from other individuals for the connection in event that the connected products contain other individual's personal information.

#### Note: Third-Party Information Collection

For your convenience the Product or Service may contain Third-Party Services or links to such. However, third parties may independently collect and process your personal information, beyond our control. Therefore, unless otherwise provided by law, we are not liable for any Third-Party Services. You should read and understand the privacy policy of Third-Party Services and decide whether to use these services.

#### 4. Retention of Your Information

Your personal data will be retained for as long as required for the purposes described in this Policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes, or as otherwise communicated with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We will cease to retain and delete or anonymize personal information once the purpose of collection is fulfilled, or we confirm your request for erasure except for retention is required by applicable law.

## 5. Disclosure of your Information

We may disclose aggregated or de-identified information about our users, and other information that does not identify any individual or device, without restriction. In addition, we may disclose personal data that we collect, or you provide:

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or

Other sale or transfer of some or all of company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by company about our Product users is among the assets transferred;

To fulfill the purpose for which you provide such information;

Any other purpose disclosed by us when you provide the information; and/or with your consent.

We may also disclose your personal data:

To comply with any court order, law, or legal process, including to respond to any government or regulatory request;

To enforce our rights arising from any contracts entered into between you and us, including the Product Software License Agreement and for billing and collection;

Which we believe disclosure is necessary or appropriate to protect the rights, property, or safety of company, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## 6. Accessing and Correcting your Personal data

You can send us an email at [DPO@puretechsecurity.co.uk](mailto:DPO@puretechsecurity.co.uk) to request access to, correct, or delete any personal data that you have provided to us. You may also object to or request us to restrict the processing of your personal data. If we process your personal data based on consent, you may withdraw your consent at any time by contacting us (see below).

A summary of your legal rights is set out below:

**REQUEST ACCESS** to your personal data (commonly known as "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;

**REQUEST CORRECTION** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us;

**REQUEST ERASURE** of your personal data. This enables you to ask us to delete or remove personal data if there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your

right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your written request;

**OBJECT TO PROCESSING** of your personal data where we are relying on our legitimate interest (or that of a third-party), and there is something about your particular situation that makes you want to object to processing on this ground as you believe it affects your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that overrides your rights and freedoms;

**REQUEST RESTRICTION** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful, but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise, or defend legal claims;
- (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it;

**REQUEST THE TRANSFER** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.

Note that this right only applies to information which you initially provided consent for us to use or where we used the information to perform a contract with you;

**WITHDRAW CONSENT AT ANY TIME** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain Product or Service to you. We will advise you if this is the case at the time you withdraw your consent.

For security reasons, we will take steps to authenticate your identity before providing access to your personal data.

You also have the right to lodge a complaint with the relevant Data Protection Authority.

## 7. International Transfers

Our headquarters are in the United Kingdom, and we operate globally. We have established subsidiaries and affiliates in different regions around the world and we offer our product or service through the use of servers located in different countries. We have taken the necessary measures to ensure that your personal data is processed in conformity with the applicable laws and appropriate technical security measures are adopted to safeguard your privacy. Where necessary we use Standard Contractual Clauses, which are approved by the European Commission to comply with applicable legislation.

## 8. Data Security

We have implemented measures designed to secure your personal data from accidental loss and from unauthorised access, use, alteration, and disclosure.

Your personal data will be retained for long as required for the purposes described in this policy. Or as such is necessary for compliance with statutory obligations and for solving any disputes. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data;

The purposes for which we process your personal data and whether we can achieve those purposes through other means; and the applicable legal requirements.

## 9. Changes to Our Policy

We may revise or change this Policy from time to time. You may access to the updated version after upgrading the Product software via online upgrade function of the Product. All changes are effective immediately when we post them and apply to all access to and use of the Product or service thereafter; provided, to the extent required by law, we will seek your affirmative consent prior to applying material modifications to this Policy on how we use or disclose personal data that we collected or received prior to the date of the modification. You are expected to check this Policy frequently, so that you are aware of any modifications, as they are binding on you.

## 10. Contact Information

To ask questions or comment about this Policy and our privacy practices, contact us via email or by mail at:

DPO@puretechsecurity.co.uk

Puretech Electrical Products  
36 New Lane  
Havant  
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C/O: Data Protection Officer