

## **Privacy Policy for ASBISC Enterprises PLC**

Effective date: 20.05.2021

Updated date: 20.05.2021

ASBISC Enterprises PLC, Its affiliates and subsidiaries (hereinafter - "we", "us", "our", "ASBISC Enterprises PLC") take a responsible approach to protecting your privacy. This privacy policy (hereinafter referred to as the "Policy") describes how we work to ensure the privacy of Personal Data that we process when you use the following services, products and related mobile applications (hereinafter collectively, the "Products"): AENO mobile app

In this privacy policy, "Personal data" means information that can be used to identify a person, either solely on the basis of this information, or in the aggregate of this and other information available to us about this person. Smart devices are non-standard computing devices that are manufactured or manufactured by hardware manufacturers, with a human-machine interface and the ability to transmit data and wirelessly connect to a network, including household smart devices, wearable smart devices, smart devices for air purification, etc. The term "Applications" refers to those mobile applications developed by ASBISC Enterprises PLC that provide end users with remote access to Smart devices and connectivity to the ASBISC Enterprises PLC platform IoT providers.

For other brands of mobile applications supported by ASBISC Enterprises PLC, our Customers control all Personal Data collected through our Products. We collect information under the direction of our Clients, and the processing of such information is limited to purposes related to the provision of the service for which Clients engage us. If you are a customer of one of our Customers and would no longer like to be contacted by one of our Customers using our service, you need to contact directly the Customer with whom you are interacting.

### **What Personal Data we collect**

In order to be able to provide you with services, we will ask you to provide us with the Personal Data necessary for this. If you do not provide Personal Information, we may not be able to provide you with our products or services.

#### **1. Information you provide us voluntarily**

- Account or profile information. When registering for an account, we may store your name and contact information, such as your email address, telephone number, username and login information. In the course of your interactions with our Products, we may additionally collect information from your account, such as your nickname, profile picture, country code, preferred language or time zone.
- Feedback. When you use the feedback and suggestion features provided in our Products, we collect data such as your email address, mobile phone number and the content of your message in order to be able to promptly address problems and fix device malfunctions.

#### **2. Information We Collect Automatically**

- Device Information. When you use our Product, we automatically collect device information such as the MAC address of your devices, IP address, wireless information, operating system type and version, application version number, push notification ID, system log files, and information about the mobile network.

## **Purposes and legal basis for the processing of Personal Data**

We have the right to process information about you for the following purposes.

- Providing services to you. We process your account and profile data, device information, usage data, location information and information related to Smart devices in order to provide the Products and services that you have requested or purchased. The legal basis for this processing is the performance of a contract with you in accordance with the Terms of Use.
- Improving our services. We process information about your device, usage data, location information and information related to Smart devices in order to ensure the functionality and security of Products, develop and improve Products and services, analyze the effectiveness of our operations, and prevent and track fraud or improper use. The legal basis for this processing is the performance of a contract with you in accordance with the Terms of Use.
- Non-marketing communication. We process Personal Data to send you important information about services, changes to our terms and conditions and / or other administrative information. Since this information may be sensitive, you cannot opt out of receiving such communications. The legal basis for this processing is the performance of a contract with you in accordance with the Terms of Use.
- Marketing communication. We may process your Personal Data to send you marketing and advertising materials about our Products and services. If we do so, each message we send you will contain instructions on how to opt out of receiving further communications of this nature. The legal basis for this processing is your consent. In addition, if you agree to participate in our sweepstakes, contests or other promotions, we may use your Personal Information to organize such events.
- Personalization. We may process your account and profile data, usage data, device information to personalize product designs and provide you with tailor-made services, such as recommending and displaying information and advertisements for products suitable for you, and inviting you to participate in surveys. related to your use of our Products. The legal basis for this processing is your consent.
- Compliance with legal and regulatory requirements. We may process your Personal Data if we believe it is necessary or appropriate: a) to comply with applicable laws and regulations; b) to carry out court orders; c) to respond to inquiries from government agencies; d) to enforce our terms; e) to protect our operations, business and systems; f) to protect our rights, the confidentiality of our data, security or property and / or rights, data confidentiality, security or property of other users, including you; and g) to enable us to use the remedies available to us or to limit the damage we may suffer.
- Usage data. When you browse our sites and services, we automatically collect usage data regarding visits, clicks, downloads, messages sent and received, and other actions by users of our sites and services.
- Syslog data. When you use our application, the system log and exception log may be loaded from your device.
- Location information. We may collect information about your precise or inaccurate geographic location in real time when you use certain Products or services in the AENO app

### **3. Information related to Smart devices**

- Basic information about Smart devices. When you connect your Smart Devices to our Products or services, we may collect basic information about your Smart Devices, such as device name, device ID, online status, activation time, firmware version and update information.
- Information transmitted by Smart devices. Depending on which Smart Devices you choose to connect to our Products or services, we may collect various information transmitted from your Smart Devices.

## **Who do we share Personal Data with?**

ASBISC Enterprises PLC provides Personal Data only in the manner that it informs you about. We may share Personal Data with the following recipients:

- our third party service providers who perform certain functions related to our business activities, such as hosting a website, analyzing data, processing payments and credit cards, providing infrastructure, IT services, customer support services, email delivery services and others similar services to enable them to provide such services to us;
- our customers and other commercial partners who provide you, directly or indirectly, with your Smart Devices and / or networks and systems through which you access and use our sites and services;
- to affiliates or other third parties in the event of a reorganization, merger, sale, joint venture, transfer of rights, transfer of all or part of our business, assets or shares, or other disposition to the above (including in connection with bankruptcy or similar procedures). You will be notified of the occurrence of the above cases by email and / or posting on our website a prominent notice of a change in ownership structure, an incompatible new use of your Personal Data and options available to you in relation to your Personal Data;
- if we believe it is necessary or appropriate: a) to comply with applicable laws and regulations; b) to carry out court orders; c) to respond to inquiries from government and government agencies, including government and government agencies outside your country of residence; d) to enforce our terms; e) to protect our operations, business and systems; f) to protect our rights, the confidentiality of our data, security or property and / or rights, data confidentiality, security or property of other users, including you; and g) to enable us to use the remedies available to us or to limit the damage we may suffer;
- subsidiaries or affiliates within our corporation to conduct our standard business activities.

Information is transferred to third parties not related to the above persons only with your consent.

## **Transfer of collected data to third countries**

To optimize our activities, we may transfer your Personal Data to countries other than your country of residence, as well as store and process it in such countries.

## **Your rights in relation to your Personal Data**

We respect your rights in relation to your Personal Information, including your right to control it. You can exercise any of the following rights:

through the menu Profile - Personal Center

This service is free and we will endeavour to respond to you within 30 days. If you decide to send us an email, please make it clear in your request what information you would like to change, whether you would like your Personal Information removed from our database, or otherwise tell us what restrictions you would like us to place on our use of your Personal Information. Please note that for security reasons, we may ask you to confirm your identity before taking any further action on your request

You have the right:

- request access to your Personal Data that we process;
- ask us to correct inaccurate or incomplete Personal Information about you;
- request the deletion of your Personal Data;

- request to set temporary or permanent restrictions on the processing of some or all of your Personal Data;
- request the transfer of Personal Data to you or to a third party if we process the data on the basis of your consent or an agreement with you and if the processing is automated on our part; and
- withdraw your consent to our use of your Personal Data or object to such use if it is based on your consent or our legitimate interests.

### **Safety**

We use commercially reasonable physical, administrative and technical measures to protect the integrity and security of your Personal Data. ASBISC Enterprises PLC applies various security strategies to effectively protect user and device data. In order to protect access to devices, ASBISC Enterprises PLC applies its own algorithms for data isolation, authentication and access rights verification. When transmitting data, security algorithms, transmission encryption protocols are used, and also commercial-level encrypted information transmission is supported using dynamic keys. Data processing is subject to strict filtering, validation and full data validation. When storing data, all confidential user information is encrypted for security purposes during storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that the security of any account you have registered with us is at risk), you can immediately notify us of the problem by sending message to [info@asbis.com](mailto:info@asbis.com)

### **Data storage**

We process your Personal Data for the minimum period necessary for the purposes specified in this privacy policy, unless we are required by law to keep the data for a longer period. We set an appropriate retention period based on the volume, nature and significance of your Personal Data, and after the end of the retention period, we destroy your Personal Data. If we are unable to do so for technical reasons, we will take appropriate measures to prevent further use of your Personal Data.

### **Changes to the privacy policy**

We may update the provisions of this privacy policy to reflect changes in our information handling practices. We will notify you of any material changes by email (send an email to the email address on your account) or via a notification in the mobile app prior to such changes taking effect. We encourage you to periodically review this page for the most current information on our privacy practices.

### **Contact details**

If you have any questions about our working methods or in connection with this privacy policy, you can contact us using the following contact details:

ASBISC Enterprises PLC.

Postal address: Diamond Court, 43 Kolonakiou Street, Agios Athanasios, 4103 Limassol, Cyprus

Email address mail: [info@asbis.com](mailto:info@asbis.com)