

Aztech Privacy Policy

Our Privacy Policy was updated on and is effective as at 1 November 2022.

Our promise

This Privacy Policy describes how Aztech Global Ltd and its subsidiaries (hereinafter referred to as “Aztech”, “we” or “us”) collect, use, disclose, process, and protect the information you provide to us through our website (“Website”), mobile application and services provided thereunder (collectively referred to as “Services”) which may be used in conjunction with our hardware products (“Products”) or in other ways that we may provide.

If we ask you to provide certain information in order to verify your identity when using Products or Services, we will use such information strictly in accordance with this Privacy Policy.

In this Privacy Policy, “personal information” refers to information whether true or not, about an individual who can be identified (directly or indirectly) from that information alone, or from that information combined with other information about the individual Aztech has or is likely to have access to. Such personal information includes, but is not limited to, some of the information you provide to us through the Services.

BY USING OR ACCESSING AZTECH PRODUCTS AND SERVICES, YOU REPRESENT AND WARRANT THAT YOU HAVE READ, ACKNOWLEDGED AND ACCEPTED THE PROVISIONS HEREIN, INCLUDING ANY CHANGES WE MAY MAKE FROM TIME TO TIME. IF YOU HAVE QUESTIONS OR CONCERNS REGARDING OUR PRIVACY POLICY OR PRACTICES, PLEASE CONTACT US AT THE DETAILS PROVIDED BELOW.

Information collected and how we use it

Types of information collected

The personal information that we collect from you is necessary for us to successfully provide our Services to you. We will only collect information that is necessary and utilize it for the purpose(s) for which it was collected. Such purposes include, but are not limited to:

- (i) **Information provided through our mobile application:** personal information you provide to us, like your name, user name, password, mobile phone number, email address, or data you may sync with the device you use to access our mobile application, information used to create your account or related to your account setup on the mobile application, devices you add or information that you send, and feedback provided.

- (ii) **Information related to your mobile device or SIM card:** information related to the mobile device terminal, including but not limited to: IMEI number, IMSI number, the version of your operating system, manufacturing information about your device, model name, and network operator. We also collect information about the device associated with your account, including but not limited to the MAC address, DID, network status of the device (IP/network signal), and the version of your firmware.
- (iii) **Location information (only for specific aspects of our Services):** types of information on your location, including but not limited to the region, country code, city code, mobile network code, mobile country code, cell identity, district name, longitude and latitude information, time zone settings and language settings.
- (iv) **Log information:** information related to your use of certain Services, including but not limited to cookies and other anonymous identifier technologies, IP address, network request information, temporary messaging history, standard system logs and crash information (please see our Cookies Policy for more information).
- (v) **Other information:** environmental characteristics value (ECV) (i.e. value generated from Account ID, phone device ID, connected Wi-Fi ID and location value).
- (vi) **Account credentials:** account information related to your account credentials, including but not limited to your name, username, password, password security questions and answers, email address, etc.

We also collect other types of anonymous information which are aggregated, anonymized or de-identified. For example, the device model and system version number of the user's mobile phone device may be collected when the user uses a particular service. Such information is collected in order to improve the Services we provide to you.

Using personal information

You hereby consent that we may process and disclose personal information to our affiliated companies and/or third-party service providers for the purposes stated in this Privacy Policy.

Your personal information may be used for one or more of the following purposes:

- (i) Providing, processing, maintaining, improving, and developing our goods and/or Services to you, and Services provided through your device or by Aztech;
- (ii) Communicating with you about your device, service, or any general queries, such as updates, device firmware/software updates, customer support, related information, and notices);
- (iii) Conducting marketing-related and promotional activities, details of which can be found in the Direct Marketing section below;
- (iv) Analyzing and developing statistics on the use of our Products and Services so as to improve our Products and Services;
- (v) Setting up your Aztech Account: personal information you provide when creating an Aztech Account on our web sites or through our mobile application is used for creating your account and profile page;
- (vi) Providing location-based Services in our mobile application: we use information about your location to determine the time zone of the mobile device from which you access or use the application. This will ensure that the application displays the accurate time and location to optimize the user experience. You may turn off this feature at any time via the device settings or by discontinuing your use of the application;
- (vii) Accessing devices: Devices on which the application is operated must be verified. We need to confirm the legal identity of the device by consulting the factory MAC and DID information. In addition, to connect the device to the network, the device will need to be configured through the application. During the configuration, you must enter the corresponding Wi-Fi name and password. This information will only be used to connect the device to the network. The Wi-Fi and password data you enter will be encrypted and stored locally on your device and will not be uploaded to the server. In addition, you may access the device and delete this information at any time. It is necessary for us to analyze the device's IP and network signal in order to determine the optimal network connection method, thereby ensuring the stability of the device network;
- (viii) Setting up automated tasks: The event information reported by your device can be used to create your personalized automated tasks. This event information comes from the device you have added. The specific information that can be set depends on the scope of your privacy authorization for the device;
- (ix) Providing push Services: Account numbers and IMEI Numbers will also be used for the Aztech push service, which sends device notifications to the user. You may turn off this feature at any time by changing the preferences listed under "Message Settings";
- (x) Verification of user identity: Aztech uses ECV to verify user identities and ensure that hackers or other unverified persons are unable to log in;

(xi) Collecting user feedback: The feedback you provide is extremely valuable as it helps us to improve the Services provided by us. We may use the personal information you provide to us to contact you and will retain such information in our records; or

(xii) Sending notifications: We may occasionally use your personal information to send important notifications, for example, notifications about the status of device malfunctions, your customized device push notifications (which vary depending on the additional equipment purchased) and changes to our terms, conditions, and policies.

Direct marketing

We may use the personal information you provide to us to market to you products and services offered by Aztech or our business partners. We will only use your personal data after we have obtained your consent in accordance with the applicable data protection laws. You have the right to opt in to or out of the use of your personal data for direct marketing. You may opt out from receiving some or all types of communication from us by clicking on the unsubscribe link located at the bottom of each email. We will not transfer your personal data to our business partners for their use in the course of our direct marketing.

Sharing of personal information

We may disclose your personal information to law enforcement agencies and/or government authorities if required by law. We may also share your personal information with other affiliated companies of Aztech and/or other third parties as necessary to provide you with the full functionality of our Products and Services.

Third-party service providers may process your personal information on Aztech's behalf or for one or more of the purposes listed above. If we share your information with a third-party service provider, we will ensure that the third-party service provider has a comparable level of data protection as is provided by the applicable data protection legislation.

To provide some of the Services, requested by you, in our mobile applications, we may share your IP address with third parties. If you no longer consent to us sharing such information, please contact us at dpo@aztech.com.

We do not sell any personal information to third parties.

Information not requiring consent

We may share anonymized information in aggregate form with third parties (such as advertisers on our website) for commercial purposes. We may share trends in the usage of our Services, for example, the number or particular group of customers who purchase certain Products or engage in certain transactions.

For the avoidance of doubt, Aztech may collect, use, or disclose your personal information without your consent if it is, and only to the extent it is, allowed explicitly under local data protection laws. We may also disclose your information without your consent if we believe in good faith that it must be disclosed in order to protect our rights, your safety, or the safety of others, investigate fraud, or to respond to government requests.

Security commitment

Aztech's security measures

We are committed to keeping your personal information secure. In order to prevent unauthorized access, disclosure and other similar risks, we have put in place reasonable physical, electronic, and internal procedures to protect the information we collect from you during your use of our mobile application.

We store your personal information on secure servers which are protected in controlled facilities either directly by us or by a third party contracted by us. We classify your data based on importance and sensitivity and we will do our best to ensure that your personal information is always protected by a high level of security. We also strive to ensure that employees and third-party service providers who access your personal information in providing products and services to you will be held under strict contractual confidentiality obligations. Similarly, we have special access control measures for cloud-based data storage. In summary, we regularly review our information collection, storage, and processing practices, including physical security measures taken to prevent any unauthorized access and use.

We will take all practicable steps to protect your personal information. You should, however, be aware that the use of the internet is not entirely secure, and for this reason, we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the internet.

Where there is a breach of personal data, we will act upon the breach in a timely fashion, by notifying the relevant authority and/or the relevant data subjects in accordance with applicable data protection laws.

What you can do

You can play your part in safeguarding your personal information by not disclosing your login password or account information to any person unless such person is duly authorized by you. When you log into your account, always take care to log out at the end of each session, especially if you are using another person's device.

Aztech shall not be held responsible for lapses in security caused by third party access to your personal information as a result of your failure to keep your personal information

private. Notwithstanding the foregoing, you must immediately notify us if any online users access your account without permission or if any other security breaches occur.

Your cooperation will help us better protect your personal information.

Retention policy

We retain your personal information for as long as such information is still needed for the purpose(s) for which the information was obtained or for as long as required by applicable laws. We shall cease to retain personal information and remove the means by which the personal information can be associated with particular individuals as soon as it is reasonable to assume that the purpose for which the personal information was collected is no longer being served by retention of the personal information. If further processing of the personal information is required for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes according to the applicable laws, your personal information may be further retained by us even if the further processing is incompatible with original purposes. In such cases, we will notify you of the new purpose(s) for which your personal data will be used.

Accessing other features on your device

Our application will need to access certain features on your device, for example, Wi-Fi network status. This information is necessary for our application to run on your device and for you to be able to use the application. To revoke your consent for us doing so, you may close the application on your device at any time or contact us at dpo@aztech.com. Please note that this may affect the Services which we are able to provide to you.

Accessing, updating, correcting, erasing or restricting processing of your personal information

You have the right to request access to and/or to correct any personal information we collect about you. You will be asked to verify your identity before your request to update your personal information is processed. Once we have completed the identity verification step, we will be able to process your request to access and/or make corrections to your personal information. We will respond to your request within the time frame specified by applicable data protection laws.

A copy of your personal data collected and processed by us will be provided to you upon your request free of charge. For any extra request of the same information, we may charge a reasonable fee based on actual administrative costs in accordance with applicable laws. If you would like to request access to your personal data held by us or if you believe any information we hold about you is incorrect or incomplete, please write to us or email us as soon as possible at dpo@aztech.com.

If you are using or accessing our Products and Services from the European Union (EU), under the General Data Protection Regulation (GDPR), you have the right to request the

erasure of your personal information. Where you have made a request to us for erasure, we shall consider the grounds regarding your request and take reasonable steps, including technical measures, in accordance with the GDPR.

As an EU user, you also have the right to restrict the processing of your personal information in certain circumstances. We shall consider the grounds regarding your restriction request. If the grounds under the GDPR apply, we shall only process your personal information under applicable circumstances in the GDPR and inform you accordingly.

As an EU user, you also have the right not to be subject to a decision based solely on automated processing, including profiling, and the right to receive your personal information in a structured, commonly used format or to transmit it to another data controller.

Withdrawal of consent

You may contact us at dpo@aztech.com to withdraw your consent for our collection, use and/or disclosure of any of your personal information we hold. We will process your withdrawal of consent within a reasonable period. You acknowledge that your withdrawal of consent may result in some legal consequences. Depending on the extent of your withdrawal of consent for us to process your personal information, it may mean that you will not be able to use or access our Products or Services.

Transfer of personal information outside of your jurisdiction

To the extent that we need to transfer personal information outside your jurisdiction, including transfers to our affiliates (which may include communications, social media, technology, or cloud Services) or to third-party service providers, we shall do so in accordance with the applicable laws. In particular, in order to ensure that all such transfers comply with applicable local data protection laws, we will implement appropriate security safeguards. You have the right to be informed of the appropriate safeguards implemented by us for this transfer of your personal information. For example, if you choose to use other third-party services available for this product or service (such as Amazon Alexa, Google Assistant, etc.), those third parties may be able to read information about you and information about you may also be transferred to a third-party server outside of your jurisdiction. By using our Services, you agree to this type of transfer of personal information.

Aztech is a Singapore-headquartered company operating globally. As such, we may transfer your personal data to any subsidiary of the Aztech group worldwide when processing that information for the purposes described in this Privacy Policy and comply with the applicable laws in undertaking such transfers.

Aztech may use overseas facilities operated and controlled by Aztech in order to process or back up your personal information. These facilities may be located in a country outside the European Economic Area (EEA). We may transfer and store your personal information in any of our overseas facilities. In undertaking such transfers and storage of your personal information, we will ensure your personal information is protected in accordance with this Privacy Policy and applicable laws.

We may also transfer your personal data to our third-party service providers, who may be located in a country or area outside the EEA.

Whenever Aztech shares personal data originating in the EEA with a data center, or third party which may or may not be a Aztech entity, outside the EEA, we will do so in line with EU standard contractual clauses and any other safeguards provided for in the GDPR.

Miscellaneous

Minors

We believe that it is the responsibility of parents to monitor their children when using our Products and Services. Our policy, however, does not require us to obtain the personal information of minors or to send any promotional materials to them.

Aztech will not seek to obtain personal information from a minor. If parents or guardians have reason to believe that a minor has provided personal information to Aztech without their prior consent, they should notify us at dpo@aztech.com. Upon receiving such notification, we will ensure that the relevant personal information is removed and that subscriptions for any of our Services which the minor may have signed up for are cancelled.

Inconsistencies with this Privacy Policy

If you agree to an applicable user agreement, and the user agreement is inconsistent with this Privacy Policy, the user agreement shall prevail.

Privacy Policy Updates

We periodically review our Privacy Policy and will update it to reflect changes in our practices and applicable legislation. If we make a substantial change to this Privacy Policy, we will notify you by email (using the email address specified in your account), by releasing a notice in the mobile application, or by contacting you via your mobile device. Changes to this Privacy Policy will be effective starting on the date specified in the notice or on the website. We recommend that you visit this page regularly for the latest information on our privacy practices. Your continued use of our Products and Services will be deemed as your acceptance of the updated Privacy Policy. If we collect additional personal information from you, or if we wish to use or reveal your personal information for a new purpose, we will seek your consent again in these instances.

Do I have to agree to all the terms and conditions of third parties?

Our Privacy Policy does not apply to products and services provided by third parties. Aztech Products and Services may include third party products and services as well as links to third-party websites. When you use these Products or Services, they may also collect your information. As such, we strongly urge you to spend time reading the privacy policies of these third parties. We shall not be responsible for the way third parties use the personal information they collect from you, nor do we have any control over how they use the personal information. Our Privacy Policy does not apply to other websites which may be accessed through our Services.

Contact us

If you have any questions or feedback regarding this Privacy Policy, or if you have any questions regarding Aztech's collection, use, or disclosure of your personal information, please contact our Data Protection Officer at the address or email listed below.

Address:

Data Protection Officer

Aztech Global Ltd
31 Ubi Road 1, #01-05, Singapore
Singapore 408694

Email: dpo@aztech.com