



DATA PRIVACY POLICY

Aztech Global Ltd. (the “**Company**” or “**Aztech**”) and its group of subsidiaries (collectively, the “**Group**”) last updated our data privacy policy on and is effective as at 18 July 2019 to provide details on how the Group (hereinafter referred to as “Aztech“, “we” or “us”) manage the personal information you disclose to us when using our Products and Services.

Our promise

This Privacy Policy describes how we 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 for your provision of certain information for identity verification when using our Products or Services, we will use such information in strict 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 Aztech has or is likely to have access to about that individual. 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 OUR DETAILS PROVIDED BELOW.

Information collected and how we use it

A) Types of information collected

The personal information that we ask for your provision is necessary for us to successfully provide our Services to you. We will only collect information that is necessary and utilise it for the purpose of its collection. Such purpose includes, but is not limited to:

1) Information provided through our mobile application

Personal information includes your name, user name, password, mobile phone number, email address, or data you may sync with the device you use to access or use 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.

2) 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, MAC address, DID, network status of the device (IP/network signal), and the version of your firmware.

3) Location information (only for specific aspects of our Services)

Types of information on your location, including but not limited to, region, country code, city code, mobile network code, mobile country code, cell identity, district name, longitude and latitude information, time zone settings, language settings.

4) 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 attached our Cookies Policy for more information).

5) Other information

Environmental characteristics value (ECV) (i.e. value generated from Account ID, phone device ID, connected Wi-Fi ID and location value).

6) Account credentials

Information related to your account credentials, including but not limited to, name, user name, 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 using a particular service. Such information is collected in order to improve the Services we provide to you.

B) How this personal information can be used

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

Your personal information shall 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) Communication 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 activities. For more information on marketing and promotional activities, please refer to the Direct Marketing section below; and/or
- (iv) Analyzing and developing statistics on use of our Products and Services to better improve our Products and Services.

Below are further details on how we use your information (including personal information):

- (i) **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.
- (ii) **Providing location-based Services**
When using 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 accurately displays the time and location to optimize user experience. You can turn off this feature at any time by going to device settings or by discontinuing your use of the application.
- (iii) **Accessing devices**
The authenticity of devices that are operated through the application must be verified. We therefore need to confirm the legal identity of the device by consulting the factory MAC and DID information. In addition, in order to connect the device to the network, it will need to be configured through the app. During 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; it will not be uploaded to the server. In addition, you can access the device and delete this information at any time. We also need to analyze the device's IP and network signal in order to determine the optimal network connection method. This will ensure the stability of the device network.
- (iv) **Setting up automated tasks**
The event information reported by your device (this 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. Every added device will provide the Privacy Policy terms for the provider of that device, which you may then choose to agree with) can be used to create your own, personalized automated tasks.
- (v) **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 can turn off this feature at any time by changing the preferences listed under “Message Settings.”

(vi) **Verification of user identity**

Aztech uses EVC to verify user identities and ensure that hackers or other unverified persons are unable to log in.

(vii) **Collecting user feedback**

The feedback you choose to provide is extremely valuable, as it helps us improve the Services provided by us. In order to track your feedback, we use the personal information you provide to contact you and for our record.

(viii) **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 depend on what additional equipment you have 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 so use your personal data after we have obtained your prior consent in accordance with your local data protection laws. You have the right to opt in to such use of your personal data for direct marketing. If you do not wish to receive certain types of email communications you may opt-out by following the unsubscribe link located at the bottom of each email communication. We will not transfer your personal data to our business partners for use by our business partners in direct marketing.

How do we share your information?

If required, we will share your personal information with law enforcement agencies, government authorities and, in order to operate successfully and provide you with the full functionality of our Products and Services, we disclose your personal information to other Aztech affiliated companies and/or other third parties.

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.



When using certain mobile applications on our devices, in order to provide you with some of the Services you requested, we share your IP address with third parties. If you no longer wish to allow us to share this information, please send us an email at feedback@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 common usage of our Services, for example, the number of customers in a particular group 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, or 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 the mobile application.

All of your personal information is stored on secure servers and 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 provide products and services to you by accessing this information 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 in order 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 it in a timely fashion, by notifying the breach to the relevant supervisory 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 anybody unless such person is duly authorized by you. When you log into your account, always be mindful to log out at the end of the session, especially if you are using another person's device.

Aztech cannot 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 information we collect about you as long as it is still needed for the purposes we obtained it or for as long as it is needed to comply with applicable legal requirements or permissions. We shall cease to retain personal information, or 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 that personal information was collected is no longer being served by retention of the personal information. If further processing 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 data may be further retained by us even if the further processing is incompatible with original purposes. Should that be the case, we will notify you of any new purpose in which your personal data is 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 it. You can close the application on your device at any time, or you can contact us at feedback@aztech.com to revoke your consent. Please note that this may affect the Services which we are able to provide to you.

You have control over your personal information

If you have previously agreed to let us use your personal information for the purposes described above, you can change your decision at any time by writing to us at 31 Ubi Road 1, #01-05, Singapore 408694 or sending an email to feedback@aztech.com or by changing any relevant control settings through the application.



Access, update, correct, erase or restrict processing your personal information

You have the right to request access to and/or to correct any personal information we hold about you. When you update your personal information, you will be asked to verify your identity before your request is processed. Once we have a sufficient amount of information, we will be able to process your request to either access or make corrections to personal information. We will respond to your request within the time period specified by applicable data protection law.

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 according to the applicable laws. If you would like to request access to your personal data held by us or if you believe any information we are holding about you is incorrect or incomplete, please write to us or email us as soon as possible at feedback@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 obtain from us 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 can submit a request to us, by email at feedback@aztech.com, to withdraw your consent for us to collect, use and/or disclose any of your personal information that we hold or control. We will process your submission within a reasonable amount of time, after which, we will abide by your request and no longer collect, use, and/or disclose your personal information. 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, whether it is transferred to our affiliates (these 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 law, we will implement appropriate security safeguards. You will have the right to be informed of the appropriate safeguards taken 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 kind of transfer.

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

Aztech may use overseas facilities operated and controlled by Aztech to process or back up your personal information which may be located in a country outside the area of the European Economic Area (EEA). Aztech currently has data centers in Beijing, the United States, Russia, Singapore, and Germany. We may transfer and store your personal information in one of our overseas facilities; however, this does not change our full commitment to protecting your personal information in compliance with this Privacy Policy.

We may also transfer your personal data to our third-party service providers, who may be located in a country or area outside the area of 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 on the basis of EU standard contractual clauses or 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 or attempt to seek out any way 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 contact us at feedback@aztech.com to ensure that such personal information is removed and that subscriptions the minor may have for any of our applicable Services are cancelled.

Order of priority

If you agree to an applicable user agreement, and if there is any inconsistency between the user agreement and this Privacy Policy, the user agreement will prevail.



Privacy Policy Updates

We periodically review our Privacy Policy, and we may update it to reflect changes in our practices. 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. This will allow you to understand what information we collect and how we use it. These kinds of 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 once again seek your consent.

Do I have to agree to all 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. Because of this, we strongly urge you to spend time reading the privacy policies of these third parties, just as you have read ours. We do not take any responsibility for the way in which third parties use the personal information they collect from you, nor do we have any control over how they use it. Our Privacy Policy does not apply to other websites whose links can 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 Technologies Pte Ltd
31 Ubi Road 1, #01-05, Singapore
Singapore 408694

Email: feedback@aztech.com



COOKIES POLICY

INFORMATION ABOUT OUR USE OF COOKIES

Aztech Global Ltd. (the “**Company**” or “**Aztech**”) and its group of subsidiaries (collectively, the “**Group**”, hereafter “we” or “us”) uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer’s hard drive.

If you would like to find out more about cookies please visit www.allaboutcookies.org or www.aboutcookies.org, which explain how cookies work and how you can manage their use.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.