# SentienceLab Privacy Policy

We at SentienceLabLab( further named as SentienceLabLab) are committed to protecting your privacy. Our goal is to provide you with a positive experience on our websites and when using our apps, products and services, while at the same time keeping your Personal Information, as defined below, secure. Our privacy practices are described below, as well as in separate notices given when an app, product or service is purchased or downloaded (our "Privacy Policy"). This Privacy Policy covers all SentienceLab Products(such as SenseBox etc) and SentienceLab websites. By visiting SentienceLab websites, using SentienceLab Products or providing us with your Personal Information (as defined below), you are accepting and consenting to the practices, terms and conditions described in this Privacy Policy.

SentienceLab wants to make SentienceLab websites easy for you to navigate and SentienceLab Products easy for you to use. We are constantly improving SentienceLab websites and SentienceLab Products to make them more user-friendly.

For ease of reference, we will use the following terms in this Privacy Policy: "SentienceLab", "our", "us" or "we" means SentienceLab., including its global subsidiaries and affiliated companies . "SentienceLab websites" include all global SentienceLab websites. "SentienceLab Products" includes all SentienceLab branded apps, products and services.

If you are in the European Economic Area ("EEA"), the data controller for the purposes of European data protection law is SentienceLab.

### **Types of Information Covered by This Privacy Policy**

SentienceLab may collect both Personal Information and Non-Personal Information. "Personal Information" means any information that can be used to identify you. Some examples of Personal Information include your name, address, email address and phone number. "Non-Personal Information" means information that on its own cannot be used to identify you. Some examples of Non-Personal Information include usage data relating to SentienceLab websites and SentienceLab Products, language preferences and SentienceLab website page views.

Information may be aggregated and/or anonymized. When information is aggregated, it is combined with information about other customers and users. When information is anonymized, Personal Information is removed from collected data and the remaining portion of the data, containing only Non-Personal Information, is repurposed for internal or external use, such as, for example, to determine how many users of a particular router include an Internet-enabled television in a home network environment, or how many users viewed a particular website video or advertisement. Aggregated information that includes Personal Information is considered Personal Information until it has been anonymized. Anonymized information is considered Non-Personal Information. In general, usage data collected when you visit SentienceLab websites or use SentienceLab Products is both aggregated and anonymized so it does not identify you personally and is therefore Non-Personal Information.

The SentienceLab websites and SentienceLab Products are not directed to, nor does SentienceLab knowingly collect Personal Information from children under the age of 13. If we are informed that we have collected the Personal Information of a child under the age of 13, we will delete that Personal Information from our systems. If you believe we might have inadvertently collected Personal Information from or about a child under the age of 13, please contact us at info@sentiencelab.com.

#### **How We Collect Information**

We may collect and process the following data about you:

Information you give us. If you fill in forms on SentienceLab websites or correspond with us by phone, email or otherwise, you may be providing us with information about you, which may include Personal Information. This includes information you provide when you register on SentienceLab websites, register or return a SentienceLab Product, subscribe to any of our services, search for a product, place an order on SentienceLab websites, participate in discussion forums or other social media functions on SentienceLab websites, enter a competition, promotion or survey, participate in a training session or other event, download firmware, software and apps, or when you report a problem with SentienceLab websites or SentienceLab Products or otherwise request support. Personal Information you give us may include your name, address, email address, phone number and other contact information, financial and credit card information and any other information that can be used to personally identify you.

<u>Information we collect about you</u>. We may automatically collect information when you use SentienceLab websites or SentienceLab Products, including:

- Technical information, including the Internet protocol ("IP") address used to connect your computer or other device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and language preferences. This information is all normally provided by your web browser, and we do not specifically request it.
- Information about your visit to SentienceLab websites, including the full Uniform Resource Locators ("URL") clickstream to, through and from SentienceLab websites (including date and time); products you viewed or searched for; page response times; download errors; length of visits to certain pages; videos watched; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse away from the page.
- Any phone number or email address used to contact customer support.
- Usage data about how and when you use SentienceLab Products, other devices that are connected to SentienceLab Products and what features of SentienceLab Products you use.
- Technical information and data gathered when your SentienceLab Products are connected to
  the Internet, such as how many and which devices are connected to your home network,
  when you use the devices and the amount of network traffic generated. We also collect
  environmental data when you use certain SentienceLab Products, such as utility settings,
  temperature and light readings in the home, motion detection and alarm events.
- If you consent, certain apps may collect information about your location. If you do not want this information collected, do not consent, or consult your device manual for instructions on how to change location settings.

<u>Information we receive from other sources</u>. We work closely with third parties who provide services to us (including, for example, business partners, subcontractors in technical, payment

and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and we may receive information about you from them.

#### **How We Use Information**

We may use the information we collect for a number of purposes. These purposes will be consistent with the reason you provided the information to us or for a directly related purpose. The uses we make of such information include the following:

- To set up an account for you on SentienceLab websites or SentienceLab Products.
- To facilitate your purchase and/or download of SentienceLab Products.
- To authenticate use of your account or purchases and/or use of a SentienceLab Product.
- To register your SentienceLab Product in our product database.
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- To assist you with customer support.
- To communicate about and administer participation in customer promotions and surveys.
- To provide the SentienceLab Products you request.
- To provide you with information about the SentienceLab Products you use, such as new features, bug fixes, service downtimes or upgrades.
- To help us develop new SentienceLab Products and improve current SentienceLab Products.
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We (or selected third parties) will contact you by electronic means only if you have opted-in to receive marketing information. "Opt-in" means that you have taken an affirmative action to receive information, such as by checking a box or clicking a button.
- To notify you about changes to SentienceLab websites and SentienceLab Products and changes to our terms, conditions and policies.
- To administer SentienceLab websites and SentienceLab Products for internal operational purposes, including troubleshooting, data and statistical analysis, testing, research and survey purposes.
- To improve SentienceLab websites and SentienceLab Products and to ensure that content is presented in the most effective manner for you and for your computer or device.
- To ensure the security of SentienceLab websites and SentienceLab Products.
- To monitor and regulate interactive features of SentienceLab websites and SentienceLab Products that you may choose to participate in, including online forums and chat rooms relating to SentienceLab Products.
- To help you navigate SentienceLab websites.
- To help you access and use certain features of SentienceLab Products remotely and to help you monitor and safeguard your home and home network.
- To provide you with information and recommendations about Internet and utility usage in your home.
- To measure or understand the effectiveness of advertising we serve to you and others who visit SentienceLab websites and to deliver relevant personalized advertising to you and others.
- To determine which aspects of SentienceLab websites and SentienceLab Products are most useful to you and other users of SentienceLab websites and SentienceLab Products.

## **Sharing Information**

Under no circumstances do we rent or sell your Personal Information to third parties for marketing purposes. We only share your Personal Information with third parties for marketing purposes if you have granted us permission to do so. We will ask for your consent, such as by email response, opt-in box or click through agreement acceptance, before we use or share your Personal Information for any purpose other than the reason you provided it or as otherwise provided by this Privacy Policy. We may share Personal Information in the following ways:

- Within SentienceLab for purposes of data processing or storage.
- Within SentienceLab's corporate group, including with our subsidiaries, affiliated companies and divisions, all of whom may use your information for the purposes disclosed in this Privacy Policy.
- With business partners, service vendors, authorized third-party agents or contractors to
  provide a requested service or transaction, including processing orders, hosting websites,
  storing your information, providing email communications on our behalf and providing
  customer support. We only provide these third parties with the minimum amount of
  Personal Information necessary to complete or provide the requested service or transaction,
  and we do not allow third parties to use your Personal Information for a different purpose
  than what was disclosed to you.
- With service providers, advisors or other third parties to the extent reasonably necessary to
  proceed with the negotiation or completion of a merger, acquisition or sale of all or a portion
  of our assets. If SentienceLab merges with or acquires or is acquired by another entity,
  Personal Information would be transferred as a whole to the successor entity.
- To comply with the law or legal process (such as responding to subpoenas or court orders), to comply with government reporting obligations and to exercise our legal rights or defend against legal claims.
- To protect our legal rights or those of others, such as protecting the SentienceLab brand or
  investigating violations of SentienceLab terms of use, violations of law, intellectual property
  infringement, misuse of SentienceLab websites, fraud or potential threats to personal safety.

In addition, we may share aggregated and anonymized Non-Personal Information, including usage data about SentienceLab Products, with third parties for a variety of purposes, including to analyze trends about home networking and utility use, to show third parties how their products could work with SentienceLab Products and to generally improve home networking. We've taken steps to ensure that this information cannot be linked back to you and we require third parties to keep all shared information in its anonymized form.

For certain SentienceLab Wi-Fi products, SentienceLab may provide the opportunity for you to connect and interface SentienceLab Products with one or more third party products and services, which will involve the exchange of information from your SentienceLab Product with the third party product or service. Your explicit consent and authorization will be required at the time of connection to the third party product or service, and will be revocable by you at any time. In some cases, if you purchase, use or download a third party product or service that connects to a SentienceLab Product, you may also be subject to such third party's privacy policy. SentienceLab is not responsible for the privacy practices of third party partners. If you access a SentienceLab Product through a third party product in this manner, you consent and agree to the privacy policy of such third party. We encourage you to

carefully read the privacy policies and terms of use of any third party products that connect to SentienceLab Products.

Any third parties with whom we share your Personal Information are required to maintain the confidentiality of the information and are prohibited from using it for any other purpose. We will take all reasonable steps to make sure these third parties comply with the same privacy principles that govern our collection of your personal information.

When making purchases on the SentienceLab website stores, SentienceLab uses a payment processor to verify your payment card information. Your payment card information is passed through to the payment processor and is not collected or stored by SentienceLab. The payment processor is authorized to use this information only to authenticate your purchase and for no other purpose.

### **Marketing**

You have the right to ask us not to process your Personal Information for marketing purposes. We will inform you (before collecting your Personal Information) if we intend to use your Personal Information for marketing purposes, or if we intend to disclose your Personal Information to any third party for marketing purposes.

We will always give you choices about your Personal Information. Some choices are presented up front in the form of Opt-in notices or acceptance boxes for marketing to you or sharing your Personal Information with third parties. In certain cases where permitted by law, we also may give you the choice to Opt-out. "Opt-out" means you have already chosen to Opt-in, but you later change your mind. One form of Opt-out is clicking the Unsubscribe link in a marketing email. This will take you off of our marketing email list. SentienceLab's general policy is to have users Opt-in, rather than Opt-out, to receive marketing information and to allow the sharing of information with third parties. Please note that these Opt-in/Opt-out choices do not apply to the receipt of mandatory website, service or software communications, such as update or downtime information, or receipt of order or shipping confirmations on SentienceLab website stores, which you may receive periodically unless you cancel your service or order or terminate use of software in accordance with the applicable terms of use or license agreement.

If you do not wish to receive direct marketing material from us or a third party, in addition to following the "Unsubscribe" instructions in a marketing email, you can send us an email request at <a href="mailto:info@sentiencelab.com">info@sentiencelab.com</a>.

#### **New SentienceLab Products**

When you purchase and/or download new SentienceLab Products, we will only use your Personal Information for the purposes set out (i) in this Privacy Policy and (ii) in any notification provided to you at the time of purchase or download.

#### Where We Store Your Information

The data that we collect from you may be transferred to, and stored at, various locations globally, including the United States. It may also be processed by SentienceLab staff or contractors operating outside your country of residence (including, if you are in Europe, outside of the EEA, or, if you are in Australia or New Zealand (ANZ), outside of ANZ) who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We also use cloud-based applications and services to store and process your Personal Information, which may result in your Personal Information being stored outside your country of residence (or the EEA or ANZ).

We will take such steps as are reasonable to make sure we and our service providers do not breach the privacy principles that govern our collection of your personal information. By providing your Personal Information to us, you fully understand and consent to the transfer, processing and storage of Personal Information outside of your country of residence where data protection standards may be different, and you consent to disclosure and use of your Personal Information to overseas service providers who may not fully comply with the particular laws of your country. Our Privacy Policy and our practices are designed to provide a globally consistent level of protection for Personal Information all over the world. This means that even in countries whose laws provide for less protection for your information, SentienceLab will still handle your information in the manner described in this Privacy Policy and in conformity with all applicable laws.

## **Accessing and Updating Your Personal Information**

We need your help in keeping your Personal Information accurate and up to date, so please notify us of any changes to your Personal Information. You can access and update your Personal Information and communication preferences at any time in the following ways:

- By clicking the "Unsubscribe" link in any email you receive from us.
- By sending an email to <a href="info@sentiencelab.com">info@sentiencelab.com</a>. Please be sure to include your name, email address and specific relevant information about the information you would like to change or the material that you no longer wish to receive.
- For many SentienceLab websites and SentienceLab Products, by signing in to your online account located at the URL provided when you signed up for the SentienceLab website or service.

We will honor your reasonable request to:

- Correct your data if it is inaccurate.
- Transfer your Personal Information to a third party.
- Delete your Personal Information, unless we are required to retain it by law.
- Provide you with a copy of Personal Information held on our current records at no charge, or for a reasonable charge if records must be accessed from backed up or archived records.

We will respond to your request promptly upon receipt. We may ask you to verify your identity before we can act on your request. If your Personal Information has been disclosed to

a third party in accordance with this Privacy Policy, we will take reasonable steps to notify the third party of any updated information you provide to us.

We note again that, if you choose to no longer receive marketing information from us, we may still communicate with you about other matters, such as product and service updates for SentienceLab Products you have purchased and customer support matters.

#### **Retention of Personal Information**

We will only retain your Personal Information to fulfill the purposes for which it was collected or as required for legitimate business purposes as described in this Privacy Policy or otherwise as permitted by law.

### **Cookies, Web Beacons and Other Web Tools**

We use automatic data collection tools like cookies, embedded web links and widgets (collectively, "web tools"). These web tools collect certain information that your browser or your mobile device sends to SentienceLab websites and SentienceLab Products, such as computer IP address, browser type and service provider. In addition, SentienceLab uses small pieces of code called web beacons. Web beacons allow a website to transfer or collect information through a graphic image request. This allows SentienceLab to collect information such as the address of the page you are visiting, the address of the referring page you previously visited, what browser or mobile device you are using, and your display settings. SentienceLab and its advertising partners use web beacons, for example, to find out if advertising on SentienceLab websites and other websites that contain SentienceLab ads is effective, or if certain videos on SentienceLab websites are being viewed.

SentienceLab may use web tools for the following purposes:

- To identify the user's country and language and distinguish you from other users of SentienceLab websites.
- To save your registration information for future use on SentienceLab websites and services.
- To allow customer surveys to appear or not appear to customers.
- To optimize your browsing experience by preloading certain features of SentienceLab websites and services on future visits to make loading times faster and more efficient.
- To understand how you use and interact with SentienceLab websites and services.
- To customize and provide you with a more personal experience when visiting SentienceLab websites or our advertising partners' websites or when using SentienceLab Products.
- To improve SentienceLab websites and services.
- To count visitors to SentienceLab websites and SentienceLab Products and analyze website traffic, such as how many visitors have come to the SentienceLab websites from advertisements on advertising partner websites.

You have the following choices regarding SentienceLab's use of web tools:

 You may refuse to accept cookies by activating the appropriate setting on your browser or mobile device. However, many features of SentienceLab websites and SentienceLab Products may not work as intended if you disable cookies, and areas that require registration or authentication and SentienceLab website store transactions will not be accessible.

- For some SentienceLab Products, you can go into the account settings and select an option
  that will remove you from personalized advertising. If you select this option, you will receive
  generic advertising as part of these SentienceLab Products rather than advertising that has
  been tailored based on your preferences.
- Many advertising companies are members of the <u>Digital Advertising Alliance</u> or the <u>Network</u> Advertising Initiative and provide opt-out choices on their websites.

We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. If we do so in the future, we will describe how we do so in this Privacy Policy. Visit the following website, <a href="www.allaboutdnt.org">www.allaboutdnt.org</a>, for more information on this developing area.

In addition to SentienceLab's use of web beacons on SentienceLab websites, we allow certain third parties who provide SentienceLab advertising on their websites to use their own web beacons within SentienceLab websites. In that case, if you click on or view a SentienceLab ad on one of our advertising partners' websites and are redirected or go to the SentienceLab website, the advertising partner places a web beacon on your browser so that we can track advertising conversions (which let us know if an ad was effective). These web beacons will appear on your browser regardless of whether you have refused to accept cookies or indicated that you do not want to be tracked on SentienceLab websites or on the Internet generally. However, they are only used by SentienceLab for the limited purpose of tracking advertising conversions and do not identify you personally in any way.

Third parties may collect information about your online activities over time and across different websites when you use SentienceLab websites. To avoid tracking by these third parties, you can exercise the choices above to reject cookies, although SentienceLab has no control over and cannot confirm whether these third parties honor the do not track browser choices you have made.

## **Security**

We strive to maintain reasonable administrative, technical and physical safeguards designed to protect the information collected by SentienceLab websites and SentienceLab Products. Unfortunately, the transmission of information via the Internet is not 100% secure. Although we will do our best to protect your Personal Information, we cannot guarantee its security; any transmission is at your own risk.

It is important to note that if you use a computer or device that can be accessed by others, other people may be able to access unencrypted Personal Information. If you do not want your information to be available to others, exercise caution when using public computers or devices or when using any computer or device to which users unauthorized by you may have access.

We recommend that you take every precaution in protecting your Personal Information when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords, and make sure you use a secure browser. You should also be aware that names that you give your Wi-Fi-enabled devices, home networks and services (also known as "friendly names") may be detectable by others outside your home, so you should not use Personal Information as part of your friendly names.

### **Updates and Upgrades**

SentienceLab Products may be updated or upgraded from time to time to provide additional features, address technical issues, and generally make your user experience better. Some SentienceLab Products include an auto-update feature, which gives us the ability to make updates automatically. You can change auto-update options by changing your settings within the SentienceLab Product account information. In very limited cases, updates may still be automatically applied, regardless of the auto-update setting. For example, we may provide an automatic update that prevents or fixes a security vulnerability or breach to your network.

### **Third Party and Social Media Linked Sites**

SentienceLab websites and online services may contain links to websites or online services operated by third parties. SentienceLab Products may also use or offer products and services from third parties, such as a third party app that works with a SentienceLab Product. Once you leave SentienceLab websites and SentienceLab Products, your activities are governed by the terms of use and privacy policies of the third party websites and online services. SentienceLab is not responsible for the privacy practices or the content of these websites and online services, and we encourage you to carefully read the terms of use and privacy policies of any website and online service you visit.

SentienceLab websites and SentienceLab Products may contain social media features, such as Facebook "Like" buttons. These features may collect information about your device's IP address, set cookies to facilitate interaction with social media features or link you to a social media website where you may post Personal Information. All interactions with social media features are governed by the privacy policy of the social media company providing the feature.

## **Forums/Chat Rooms**

If you participate in or post information to a discussion forum or chat room on any SentienceLab website or SentienceLab Product, you should be aware that the information you provide there will be made broadly available to others, and can be read, collected, forwarded or used by other users of these forums, potentially inside or outside SentienceLab, who have access to that forum. This information could also be used to send you unsolicited messages. Please recognize that individual forums may have additional rules and conditions. Each participant's opinion on a forum or chat room is his or her own and should not be considered as reflecting the opinion of SentienceLab. We are not responsible for Personal Information or any other information you may choose to submit in these forums, or the consequences of any submission. If at any time you would like to remove a posting, please email us at <a href="mailto:info@sentiencelab.com">info@sentiencelab.com</a>. Keep in mind that removal of a posting from a forum or chat room does not mean that the posting will be deleted from our systems, or that it has been completely removed from the Internet.

### **Updates to this Privacy Policy**

We may update this Privacy Policy from time to time, so please review it frequently. If we change our Privacy Policy, we will post the revised version here, with an updated revision

date. If we make material changes to our Privacy Policy, we will notify you by email or prominently post a notice on this website.

#### **How to Contact Us**

Should you have any privacy-related questions or comments related to this Privacy Policy, please contact us at <a href="mailto:info@sentiencelab.com">info@sentiencelab.com</a>. If you have complaints or concerns about this Privacy Policy, please contact us at the above email. We treat all complaints about a breach of the privacy laws seriously. Someone from SentienceLab will investigate your complaint and respond to you within a reasonable time.

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