

Privacy Policy of SmartControl PLUS

Welcome!

So you have purchased SmartControl PLUS and are starting to use the devices! Any information you share with us (e.g. for creating an SmartControl PLUS Account) will help us to provide you with services related to SmartControl PLUS device and to improve them to make them even better. We explain here our ways of collecting and using information, and how we protect your privacy. In this privacy policy, "personal data" means information that can be used to identify an individual, either from that information alone, or from that information and other information we have access to about that individual. We collect both personal and non-personal data to enable and facilitate the best user experience possible.

What information is collected and how do we use it?

Types of Personal Data Collected

In order to provide our services to you, we will ask you to provide necessary personal data that is required to provide those services. Set up and log in of SmartControl PLUS Account. Personal data that are collected for creating a SmartControl PLUS Account may include your email address or mobile phone number, device related information (e.g. IMEI number) and various location related information (e.g. location area code, mobile network and country codes).

Purchasing your SmartControl PLUS. When you make purchases through the SmartControl PLUS e-commerce website or other 3rd party e-commerce website such as amazon, we may collect your SmartControl PLUS Account ID (or mobile phone number or email address used to create your SmartControl PLUS Account), name, phone number, delivery address and order details, etc. SmartControl PLUS provides logistics services to deliver the products purchased on the e-commerce website. SmartControl PLUS has an after sales system to handle after sales services for users. Sync SmartControl PLUS device data. When you synchronise the SmartControl PLUS device data, e.g. to SmartControl PLUS device Cloud Service, we may collect data relating to your activities and functionalities of SmartControl PLUS device, such as those obtained from our sensors and features on SmartControl PLUS device, your device on/off time, and smart alarm related information.

Sharing your content. When you share content or send information to family and friends, we may collect personal information of those people, such as their names, email addresses, telephone numbers, and mailing addresses (if we need to send a product to them). You hereby represent and warrant that you have obtained necessary consent for use of third parties' personal data if you choose to provide them to us.

When you share content or invite users to use SmartControl PLUS device, please note that other users may see personal data you share.

Processing the services. In providing the above services, we may also collect data in relation to your device, including your SmartControl PLUS device ID, firmware version, device OS version, model and system, and visiting IP and time.

How the Personal Data is used

To provide you with our products and services, processing your orders, performing contractual obligations between you and us, to ensure the functions and safety of our products, to verify your identity, to prevent and trace fraudulent or inappropriate usage.

To develop our products and services, together with general and statistical information.

To communicate with you, including providing you with notifications on products and services that are updated or launched.

To provide marketing and promotional materials to you on our products and services (please note that you may unsubscribe anytime).

To personalise product design and to provide you with services tailored for you, for example, recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of SmartControl PLUS device.

To conduct investigations regarding our products and services. If you participate in our lottery, contest or other promotions, we may use your personal data to manage such activities.

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To provide maintenance services, monitor software licenses, to improve our products or analyse the efficiency of our operations.

Other Information

We use statistical data that does not specifically identify you (non-personal data) to help in our operations and When you create a SmartControl PLUS Account, download our software, register in our e-commerce website, participate in online surveys or interact with us in other ways, we may collect your language preferences, postal code, area code number and time zone in

which you use our products and services, and your profession.

When you opt-in to participate in our User Experience Improvement Program, we may gather statistics relating to your use of our products functions, on an anonymous basis. This may include information relating to your use of our official website, products and services. If there is an abnormal shutdown or breakdown, we may collect information relating to your mobile device to diagnose the problem.

When you use our services or functions that are based on location information, e.g. carry out a location search, take advantage of advertising, use weather functions, access information based on maps, etc., we may collect your geographical information.

When you use our website, online services, interactive applications, email messages and advertising, we may use cookies and other technical elements (e.g. pixel labels) to collect and store non-personal data. These enable us to provide you with a better experience and improve our overall service quality, e.g. in saving your preferred language settings, sending emails in a readable format, to determine whether the emails have been opened or not, etc.

When you use the Internet browser in using our products and services, we may collect log information, e.g. IP address, browser type, language, reference source, operating system, date and time marking and click rate data.

When you first use and activate your SmartControl PLUS device, the device's unique identification code and approximate geographical information may be collected.

You have control over your Information!

We recognize that privacy concerns differ from person to person. Therefore, we provide examples of ways we make available for you to choose to restrict the collection, use, disclosure or processing of your personal data and control your privacy settings, such as controlling the settings under the User Experience Improvement Program, Location Access functions, and your SmartControl PLUS Account.

Access, Updating or Correcting Your Personal Data

You have the right to request access and/or correction or any other personal data that we hold about you. When you update your personal data, you will be asked to verify your identify your identity before we proceed with your request.

Once we obtain sufficient information to accommodate your request for access or correction of your personal data, we shall process in accordance with the laws of your country. While we do our best to provide you with services, We normally provide such services for free but reserve the right to charge a reasonable fee. If you believe any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the email address below. Email: mail@acomax.de

For details relating to the personal data in your SmartControl PLUS Account, you may also access and change them at Email: mail@acomax.de

Withdrawal of Consent

You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or control by submitting a request. This may be done by accessing your SmartControl PLUS Account management center at Email: mail@acomax.de. We will process your request within a reasonable time from when the request was made, and thereafter not collect, use and/or disclose your personal data as per your request.

Please recognize that your withdrawal of consent could result in certain legal consequences. Depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that you will not be able to enjoy SmartControl PLUS's products and services.

Who do we share your information with?

Unless we tell you in this privacy policy, we will keep your personal information confidential. We may disclose your personal data on occasion to third parties in order to provide the products or services that you have requested. Some of these third parties may be located outside your home country.

Disclosure may include the scenarios listed in this section below. In each case described in this section, you can be assured that SmartControl PLUS will only share your personal data in accordance with your consent. You should know that when SmartControl PLUS shares your personal data with a third party under any circumstance described in this section, SmartControl PLUS will ensure that the third party is subject to practices and obligations to comply with the relevant data protection and privacy laws of your country. SmartControl PLUS will contractually ensure

compliance by any foreign Third Party Service Providers with the privacy standards that apply in your home jurisdiction.

Disclosure to Connector group companies and Third Party Service

the SmartControl PLUS entity which collects your personal data may Disclose your personal data from time to time to other SmartControl PLUS group companies (in communications, social media, technology or cloud business), or our third party service providers which are our mailing houses, delivery service providers, telecommunications companies, data centres, data storage facilities, and customer service providers, agents, related corporations, and/or other third parties (together “Third Party Service Providers”).

Such Third Party Service Providers would be processing your personal data on SmartControl PLUS's behalf or for one or more of the purposes listed above.

Personal data will only be shared by SmartControl PLUS to provide or improve our products or services and will not be shared for use for marketing purposes.

Disclosure to Others

SmartControl PLUS may disclose your personal data without further consent if required or permitted by law in the following cases:

cases in which the disclosure is required or authorized based on the applicable laws and/or regulations;

cases in which the disclosure is required or authorized based on the applicable laws and/or regulations;

cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of the individual or another individual;

cases in which the disclosure is necessary for the prevention of crime or legal proceedings;

cases in which the purpose of such disclosure is clearly in the individual's interests, and if consent cannot be obtained in a timely way;

cases in which the disclosure is necessary for any investigation or proceedings;

cases in which the disclosure is to any officer of a prescribed law enforcement agency upon production of written authorisation signed by the head or director of that law enforcement agency, or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer; and/or

cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

Information Not Requiring Consent

We may share anonymised information and statistics in aggregate form with third parties for business purposes, for example with advertisers on our website, or we may tell our business partners the number of customers in certain demographic groups who purchased certain products or who carried out certain transactions.

For the avoidance of doubt, in the event that we are permitted by law to collect, use or disclose your personal data without your consent, such permission granted by the law shall continue to apply.

To safeguard and secure the information we collect. We have put in place the following security procedures and technical and organisational measures to safeguard your personal data.

Information safety is very important to us. We will take all practicable steps to safeguard your personal data. Through our protective measures above, especially encrypted storage and transmission, your data is as secure as it can be. Certain details of encrypted data cannot be accessed by anyone except by you.

When this Privacy Policy applies

Our Privacy Policy does not apply to products and services offered by a third party. SmartControl PLUS products and services may include third party's products or services. When you use such products or services, they may collect your information too. For this reason, we strongly suggest you to read the third party's privacy policy as you have taken time to read ours. We are not responsible for and cannot control how third parties use personal data which they collect from you. Our Privacy Policy does not apply to other sites linked from our services.

Minors

We consider it the responsibility of parents to monitor their children's use of our products and services. Nevertheless, it is our policy not to require personal data from minors or offer to send any promotional materials to persons in that category.

SmartControl PLUS does not seek or intend to seek to receive any personal data from minors. Should a parent or guardian have reasons to believe that a minor has provided SmartControl PLUS with personal data without their prior consent, please contact us to ensure that the personal data is removed and unsubscribe them from any of the applicable SmartControl PLUS services.

Our Services are not directed to individuals under 13. We do not knowingly collect personal information from children under 13. If we become aware that a child under 13 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact us at mail@acomax.de

Updates To The Privacy Policy

We keep our Privacy Policy under regular review. If we change our Privacy Policy, we will post the changes on SmartControl PLUS websites, so that you may be aware of the information we collect and how we use it. Such changes to our Privacy Policy shall apply from the time that we post the same on the SmartControl PLUS websites. Your continued use of products and services on the websites, mobile phones and/or any other device will be taken as acceptance of the updated Privacy Policy. We will seek your fresh consent before we collect more personal data from you or when we wish to use or disclose your personal data for new purposes.