

Principles of Personal Data Protection

Identification of the software provider:

RTB media s.r.o.

Company identification No.: 294 16 876

having its registered office at Přetlucká 3396/16, 100 00 Praha 10 – Strašnice

(for the purpose of these commercial terms hereinafter referred to as “**RTB media**”)

RTB media and its subsidiary companies (hereinafter referred to as “**we**”, “**us**”, “**our**”, “**RTB media**”) undertake to protect your privacy. These Principles of Personal Data Protection (hereinafter referred to as “**the Principles**”) describe our procedures in connection with the protection of personal data that we process through your individual use of the following services, products and related mobile applications (hereinafter together referred to as “**the Products**”):

If you do not want to provide your personal data when you begin to use some of the services, you may use an application without logging in or creating an account and you still may use some RTB media s.r.o. services, for example searching and looking through any functions in the services. At this point, we will not collect personal data about an account or a profile and the collected data will be limited to the data you allowed to be collected for the purpose of using other functions of the application and/or smart devices as well as corresponding information on its use. If, however, the services you require or purchase are based on your account, go to the registration/login page where further instructions can be found.

Prior to starting to use our Products, read these Principles carefully and acquaint yourself with our intentions and procedures of collecting your personal data, including the way we use, store, share and transfer your personal data. In the Principles, you will also find the means for exercising your rights to access, updating, removing or protection of your personal data.

If you accept these Principles during the registration of your personal data or if you start using our Products and you do not expressly raise objections to the content of these Principles, we will presume that you fully understand and agree with these Principles. If you have any questions related to these Principles, do not hesitate to contact us via:

Fundamental Provisions

In these Principles, the personal data mean the information created, collected recorded and/or saved electronically or by another means that can be used to identify an individual or reflect an individual’s

activity either based on this information itself or based on this information and other information to which we have access about such an individual.

Sensitive personal data include personal biometric data, records and content of the communication, information on the state of health, information on transactions and exact information about location. If we collect sensitive personal data from you, prior to collecting sensitive personal data about you we will generate an express statement of your consent.

删除[Jeremy]:

Smart devices mean computer technology produced by hardware producers with a respective software interface and capacity to transmit data that connect to the network wirelessly, including smart household appliances, smart portable devices, smart air-cleaning devices, etc.

Applications mean mobile applications developed by RTB media s.r.o. providing their users with remote control of smart devices and the possibility to connect to the platform of an IoT supplier.

What personal data do we collect?

In order to provide you with our services, we will ask you to provide personal data which are necessary for providing these services. If you fail to provide us with your personal data, it is possible that we will not be able to provide you with our products or services.

Information you provide us voluntarily

1. Account or profile data: When you register an account with us, we may collect your name and contact details such as email address, phone number, user name, and log in information. During your interaction with our products, we may also collect into your account your nickname, profile picture, country code, language preferences, or information about your time zone.
2. Feedback: When using the feedback functions and suggestions in our products, we will collect your email address, mobile phone number, and the content of your feedback in order to timely solve your problems and solve failures of devices and applications.
3. Information based on other functions: In order to offer you more convenient services of higher quality with an optimized user experience, we may collect and use certain information if you agree with using other functions in the application. Please, take into account that if you fail to provide such information, you may continue to use basic Services of the Application and connected Smart Devices but some functions based on such additional functions may not be at your disposal. These additional functions can include:
4. Other functions using information about your location: If you allow the functions based on your location through setting permissions on your mobile device, we will collect and process information about your location in order to allow these functions, for example, matching with your smart devices. We can also collect information about your exact or approximate

geographical location in real time when you use certain Smart Devices or Services, for example, robotic cleaners and meteorological services. If you permit the function of geographical delimitation, based on your consent the information about your location will be generated and shared with Google Maps services. Please, take into account that Google has corresponding measures for personal data protection which can be read in the conditions of the Google personal data protection: <https://privacy.google.com/businesses/gdprservices/>. You may refuse such use of information about your location by administering the setting of permissions in the services after which we will stop collecting and using the information about your location.

5. Additional services using a camera: To scan a code you can use a camera which you have permitted to match with a smart device, make a recording, etc. We notify that even if you have agreed to permit a camera, we will obtain the information only if you use the camera actively to scan codes, make video-recordings, etc.
6. Other services to access pictures/videos and their recording using photo albums (library of pictures/videos): With the help of this function, after enabling the permission of a photo album you can upload your photos/pictures/videos in order to realize functions such as changing an avatar, reporting problems with using the device, providing evidence photos, etc. When using photos and other functions we do not recognize this information; but when you report a problem with using the device, we can use the recorded photos/pictures to find your problem.
7. Other services related to the service using a microphone: After enabling the permission of the microphone, you can use the microphone for sending voice information, for example, recording videos, activating a voice assistant, etc. For these functions we will collect your voice information in order to recognize your request. We notify that even if you have agreed with permitting a microphone, we will obtain the voice information through the microphone only if you activate the microphone in the application voluntarily.
8. Other services based on the permission to save: The purpose is to ensure the stable operation of the application through using the permission to save. After you have granted or designated the permission to read/record into the storage of your mobile device, we will obtain access to the pictures, files, information from the report on a failure, and other necessary information from the storage of your mobile device so that we can provide functions such as information publications or locally record the information from the report on a failure.

Please, take into account that if you enable any permission, you give us consent to collect and use the respective personal data for the purpose of providing corresponding services. As soon as you turn off any permission, we will regard it as cancelling the permission and we will not collect personal data based on respective permissions anymore and the related functions can be terminated. However, your decisions to disable a permission will not affect the previous collection and use of the data based on your permission.

Information that we collect automatically

1. Information on devices: When interacting with our product, we automatically collect the information on the device, such as the MAC address of your device, IP address, information on the wireless connection, the type and version of the operation system, the number of the application version, the identifier of push notifications, sets of reports, and information on the mobile network.
2. Data on use: During your interaction with our pages and services, we automatically collect the data on use concerning visits, clicks, downloads, sent/received messages and other uses of our pages and services.
3. Information on recording: When using our application, a system recording and a record of exceptions can be recorded. We notify that a particular person cannot be identified only based on the information about the device or the information from the record. However, if this type of impersonal information in combination with other information can be used for the identification of a particular person, this impersonal information will be regarded as personal data. Unless we received your consent or unless the laws or other legislation on personal data protection state otherwise, we will anonymize and desensibilize such impersonal information.
4. Information on location: If in the setting of permissions in your mobile device you permit the functions connected with the location, we will collect and process the information about your location in order to allow certain functions, for example, pairing with your smart devices. We can also collect information about your exact or approximate geographical location in real time when you use our particular products or services. If based on your consent you permit the function of geographical delimitation on the products, information on your location will be generated and shared with the Google Maps services. Please, take into account that Google has corresponding measures for personal data protection which can be read in detail in the Conditions of the Google personal data protection: <https://privacy.google.com/businesses/gdprservices/>. You may refuse such use of information about your location by administering the setting of permissions in the Products after which we will stop collecting and using the information about your location.

Related information on smart devices:

1. Basic information about smart devices: When you connect your smart devices to our products or services, we may collect basic information about your smart devices such as device name, device ID, online state, time of activation, firmware version and information of the updates.

2. Information reported by smart devices: Depending on the various smart devices that you wish to connect to our products or services, we may collect information reported by your smart devices.
3. Confirmation 5.1: If the product includes sensitive personal data, for example, health products, do not forget to explain it in the principles of personal data protection. For example: smart weighing machines or fitness trackers may give you height, weight, body fat mass (BFM), body mass index (BMI) and skeletal muscle mass (SMM).
4. Confirmation 5.2:
Please, take into account that if you actively agree with entering the application name and the application is interconnected with the application Apple Health and Google Fit, we will share your measured data with Apple Health and Google Fit (including the data on your BMI, height, weight and body fat mass). The purpose of sharing the data is only measuring and analysing indicators related to your health and they will never be provided to other third parties. You may terminate the services anytime by administering the HealthKit setting page or at the Google Account page. The application is authorized to connect to the Apple Health and Google Fit services.
5. Confirmation 5.3: If the product includes sensitive personal data such as snapshots from the camera, especially with the device of face recognition, do not forget to give respective explanations in the principles of personal data protection. For example, smart cameras may collect snapshots or videos they have taken.

Purposes and legal ground for processing personal data

Purposes for which we may process the information about you are as follows:

- Providing services: We process the data about your account and profile, information about the device, data about using, information about the location, and information related to the smart device in order to provide you with our products and services that you have requested or purchased. The legal ground for such processing is fulfilling our contract with you in compliance with our conditions of use.
- Improving our services: We process the information about your device, data about using, information about the location, and information related to the smart device in order to ensure the functions and safety of our products, to develop and improve our products and services, to analyse the effectiveness of our operations and to prevent fraudulent or unsuitable use and to monitor them. The legal ground for such processing is fulfilling our contract with you in compliance with our conditions of use.
- Non-marketing communication: We process your personal data for the purpose of sending important information relating to our services, changes of our conditions and principles and/or other administrative information. At the same time, we will be sending you notifications

concerning the services purchased by you such as alert services. If you wish to administer such messages, in the application you can tick the box [Application notifications]. If you decide not to permit the “Notifications” function, we will no longer process your data for these purposes. The legal ground for such processing is fulfilling our contract with you in compliance with our conditions of use.

- Marketing communication: We may process your personal data for the purpose of providing marketing and promoting materials within the Services. If we do so, each message that we send you will contain instructions that will allow you to refuse being sent messages of this type in the future. If you do not agree with marketing messages being sent by RTB media s.r.o., you can unsubscribe when you enter the application or by changing your preferences in [Setting personal data protection] of the application. The legal ground for such processing is your consent.
- Personalization: We may process the data about your account and profile, data about use, information about the device in order to adjust the design of the products and provide you with tailored services, for example, to recommend and display information and advertisements concerning products suitable for you and to invite you to participate in surveys related to your use of the services. If you do not permit us to process your personal data for the purpose of personalization, you can refuse it when you enter the application or by changing your preferences in [Setting personal data protection] in the application. The legal ground for such processing is your consent.
- Observing legislation: We may process your personal data only in cases determined by the legislation:
 - a) you granted us your consent for processing personal data for one or more particular purposes;
 - b) processing is necessary for fulfilling the contract with you or in order to carry out measures adopted prior to concluding the contract upon your request;
 - c) processing is necessary to satisfy the legal duty that applies to RTB media;
 - d) processing is necessary to protect your vital interests or the interests of RTB media;
 - e) processing is necessary to perform a task carried out in the public interest or to exercise the public authority vested in RTB media;
 - f) processing is necessary for the purposes of legitimate interests of RTB media or third parties except for the cases where your interests or your fundamental rights and freedoms have priority over those interests.

If the purpose for processing your personal data has changed, we will inform you about such a change via e-mail and/or a visible notification on our web site informing about such changes of purpose and possibilities you may have regarding your personal data.

Who do we share the personal data with?

In RTB media we share the personal data only *in the ways you have permitted or we have informed you about*. We may share your personal data with the following recipients:

- The providers of third-party services performing for us certain commercial functions such as hosting web pages, data analysis, processing of payments and credit cards, providing infrastructure, IT services, customer support services, service of email delivery and other similar services so that they can provide the services with us.
- Our customers and other business partners that provide you, directly or indirectly, with your smart devices and/or networks and systems through which you access our pages and services and use them.
- The affiliated companies or any other third parties in the case of the reorganization, merger, sale, joint venture, assignment, transfer, or another disposal of our entire enterprise, property, or shares, or its parts (among other things, in connection with bankruptcy or similar proceedings). In such a case you will be informed by email and/or a visible notification on our website informing about any change in the ownership, incompatible new means of using your personal data, and possibilities that you may have regarding your personal data.
- As we consider necessary or suitable: (a) for observing the valid legislation; (b) for responding to requests of public authorities, including public authorities outside your country of residence; (c) for enforcing our contractual conditions; (d) for protecting our rights, privacy, safety, or property and/or the rights of other users, including yourself.

With the exception of the above described third parties, to third parties only with your consent.

International transfer of collected information

With respect to saving data, RTB media will observe the valid requirements for data localization in the respective jurisdictions. In order to facilitate our activity, we may transfer, save and process your personal data in jurisdictions other than where you live. The laws in these countries may differ from the laws in force in the country of your residence. If we do so, we will ensure the appropriate level of protection of such data by means of one or more of the following approaches:

The agreement on the basis of the approved EU standard contractual clauses according to GDPR Art. 46.

More information can be found at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

If you wish to obtain further details on the protective measures that we have introduced, you can contact us directly as described in these Principles of Personal Data Protection.

Your rights relating to your personal data

We respect your rights and control over your personal data. You may exercise your rights as follows: by means of the email address info@niceboy.cz or through the feedback manners which is a part of the application Niceboy ION: Me>Personal centre>Account and security> Feedback.

You need not pay any fee and we will try to answer you within 30 days. If you decide to send us an e-mail, in your request state clearly what information you would like to change, whether you wish to delete your personal data from our database or let us know in another way with what restrictions you want us to process your personal data. Please, take into account that we may ask you to verify your identity before we take further steps based on your request for security reasons.

You may:

- request access to the personal data that we process about you;
- request that we rectify inaccurate or incomplete personal data related to you;
- request to delete personal data related to you;
- request temporary or permanent restriction of processing some or all of your personal data;
- request transmission of personal data to you or to a third party if we process the data based on your consent or a contract with you and if our processing is automated;
- refuse or object to our using your personal data if our use is based on your consent or our legitimate interests;
- withdraw your consent to personal data processing.

Withdrawal of consent

You may exercise your right to withdraw your consent in the following manners:

- in case of the authority to privacy protection obtained through the system settings of the device you may withdraw your consent by changing permissions of the device, including your location, camera, photo album (library of pictures/video), microphone, Bluetooth setting, notifications and other related functions;
- in marketing messages with which you agree, we send you the information containing instructions that allow you to withdraw from your consent in compliance with the method of “unsubscribe” described in the information;
- if you disconnect the smart device paired with the application Niceboy ION (long hold of the product icon and click on “remove device”), the information relating to the smart device will not be collected;
- when using the Product in the visitor regime, we will collect no personal data about you;

If you withdraw your consent or permission, it is possible that we will not be able to provide you with the corresponding products or services. However, withdrawal of consent or authorization will not affect the personal data processing based on your consent prior to withdrawal.

Security

We use commercially adequate physical, administrative and technical protective measures in order to maintain the integrity and security of your personal data. RTB media has various security strategies in order to effectively ensure the security of the data of a user and devices. As for the access to the device, RTB's own media algorithms are used to ensure data isolation, access verification, application for authorization. In data communication, communication by means of security algorithms, transmission encryption reports and transmission of information encryption on the commercial level based on dynamic keys is supported. When processing data, strict filtering and data validation, and full data control are applied. When saving data, all confidential information of users will be safely encrypted. If you have reason to believe that your interaction with us is no longer safe (for example, if you feel that the security of any account you have with us has been compromised), you can immediately inform us about the problem by email at info@niceboy.cz.

Data retention

We process your personal data for the minimum period necessary for the purposes given in these Principles of Personal Data Protection unless there is a special legal requirement to retain the data for a longer period. We will determine a suitable period for retention based on the quantity, nature and sensitivity of your personal data, and after the lapse of the retention time we remove your personal data. If we cannot do it for technical reasons, we will ensure that suitable measures preventing further such use of your Personal Data will be taken.

Protection of privacy of children

Protection of privacy of small children is especially important for us. The services are not intended for persons under thirteen (13) years of age (or another age determined by the valid legislation in your country/area of residence) and we ask that these persons do not provide us with any personal data. We do not deliberately collect Personal Data from persons under thirteen (13) years of age unless first we obtain the consent of a parent or a legal representative of the child. If we find out that we have collected personal data from a person under thirteen (13) years of age without the consent of a parent or a legal representative of the child, we will take steps to remove such data.

Changes of these Principles of Personal Data Protection

These Principles of Personal Data Protection can be updated to reflect changes in our information procedures. If we perform any substantial changes, we will notify you of them by email (sent to the

email address given in your account) or by means of a notification in the mobile applications before they become effective. We recommend regularly checking this page where you will find the latest information about our procedures of personal data protection.

Contact us

Should you have any questions regarding our procedures or these Principles of Personal Data Protection, contact us using the following addresses:

RTB media s.r.o.

Postal address: Přetlucká 3396/16, Strašnice, 100 00 Praha

Email: info@niceboy.cz