

# Roximo Mobile Privacy Policy

Effective Date: 27.11.2020

Updated: 27.11.2020

Roximo and subsidiaries (“we”, “us”, “our”, “Roximo”) are committed to protecting your privacy. This Privacy Policy (“Policy”) describes our practices in connection with information privacy on Personal Data we process through your individual use of the following services, products, and related mobile applications (collectively, the “Products”):

- Roximo IoT Mobile Application

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. “Smart Devices” refers to those nonstandard computing devices produced or manufactured by hardware manufacturers, with human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, smart wearable devices, smart air cleaning devices, etc. “Apps” refers to those mobile applications developed by Roximo that provide end users remote control to Smart Devices and with the ability to connect to the supplier IoT Platform.

For other branded mobile applications powered by Roximo, our Clients control all the Personal Data collected through our Products. We collect the information under the direction of our Clients and the processing of such information shall be limited to the purpose of providing the service for which our Clients has engaged us. If you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly.

## What Personal Data do we collect

In order to provide our services to you, we will ask you to provide necessary Personal Data that is required to provide those services. If you do not provide your Personal Data, we may not be able to provide you with our products or services.

### 1. Information You Voluntarily Provide Us

- Account or Profile Data: When you register an account with us, we may collect your name and contact details, such as your email address, phone number, user name, and login credentials. During your interaction with our Products, we may further collect your nickname, profile picture, country code, language preference or time zone information into your account.
- Feedback: When using feedback and suggestion features in our Products, we will collect your email address, mobile phone number and your feedback content to address your problems and solve device failures on a timely basis.

## 2. Information We Collect Automatically

- Device Information: When you interact with our Product, we automatically collect device information, such as the MAC address of your devices, IP address, wireless connection information, operating system type and version, application version number, push notification identifier, log files, and mobile network information.
- Usage Data: During your interaction with our Sites and Services, we automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our Sites and Services.
- Log Information: When you use our app, the system and exception log may be uploaded.
- Location Information: We may collect information about your real-time precise or non-precise geo-location when you use our specific Products or Services.

## 3. Smart Devices Related Information:

- Basic Information of Smart Devices: When you connect your Smart Devices with our Products or Services, we may collect basic information about your Smart Devices such as device name, device ID, online status, activation time, firmware version, and upgrade information.
- Information Reported by Smart Devices: Depending on the different Smart Devices you elect to connect with our Products or Services, we may collect different information reported by your Smart Devices.

## Purposes and legal basis for processing Personal Data

The purpose for which we may process information about you are as follows:

- Provide You Services: We process your account and profile data, device information, usage data, location information, and Smart Device related information to provide you with our Products and Services that you have requested or purchased. The legal basis for this processing is to perform our contract with you according to our Terms of Use.,
- Improve Our Services: We process your device information, usage data, location information and Smart Device related information to ensure the functions and safety of our Products, to develop and improve our Products and Services, to analyze the efficiency of our operations, and to prevent and trace fraudulent or inappropriate usage. The legal basis for this processing is to perform our contract with you according to our Terms of Use.
- Non-marketing Communication: We process your Personal Data to send you important information regarding the Services, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important, you may not opt-out of receiving such communications. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

- Marketing Communication: We may process your Personal Data to provide marketing and promotional materials to you on our Products and Services. If we do so, each communication we send you will contain instructions permitting you to opt-out of receiving future communications of that nature. The legal basis for this processing is your consent. Additionally, if you consent to participate in our lottery, contest or other promotions, we may use your Personal Data to manage such activities.

- Personalization: We may process your account and profile data, usage data, device information to personalize product design and to provide you with services tailored for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of our Products. The legal basis for this processing is your consent.

- Legal Compliance: We may process your Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## Who do we share Personal Data with?

At Roximo, we only share Personal Data in ways that we tell you about. We may share your Personal Data with the following recipients:

- To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.

- To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices, and/or networks and systems through which you access and use our Sites and Services.

- To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, incompatible new uses of your Personal Data, and choices you may have regarding your Personal Data.

- As we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, business and

systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

- To subsidiaries or affiliates within our corporate family, to carry out regular business activities.

Except for the third parties described above, to third parties only with your consent.

## International Transfer of Information Collected

To facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live. Laws in these countries may differ from the laws applicable to your country of residence.

## Your Rights Relating to Your Personal Data

We respect your rights and control over your Personal Data. You may exercise any of the following rights:

Via the “Profile – Personal Center” in our Products

You do not have to pay a fee and we will aim to respond you within 30 days. If you decide to email us, in your request, please make clear what information you would like to have changed, whether you would like to have your Personal Data deleted from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

You may:

- Request access to the Personal Data that we process about you;
- Request that we correct inaccurate or incomplete Personal Data about you;
- Request deletion of Personal Data about you;
- Request restrictions, temporarily or permanently, on our processing of some or all Personal Data about you;
- Request transfer of Personal Data to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
- Opt-out or object to our use of Personal Data about you where our use is based on your consent or our legitimate interests.

## Security

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data. [Roximo](#) provides various security strategies to effectively ensure data security of user and device. As for device access, [Roximo](#) proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization. As for data

communication, communication using security algorithms and transmission encryption protocols and commercial level information encryption transmission based on dynamic keys are supported. As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you could immediately notify us of the problem by emailing [iot@roximo.ru](mailto:iot@roximo.ru).

## Data Retention

We process your Personal Data for the minimum period necessary for the purposes set out in this Privacy Policy, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period based on the amount, nature, and sensitivity of your Personal Data, and after the retention period ends, we will destruct your Personal Data. When we are unable to do so for technical reasons, we will ensure that appropriate measures are put in place to prevent any further such use of your Personal Data.

## Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will notify you by email (send to the e-mail address specified in your account) or by means of a notice in the mobile applications prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Contact Us

If you have any questions about our practices or this Privacy Policy, please contact us as follows:

Roximo

Postal Mailing Address: Russia, Moscow, Novoostapovskaya 6AC3, off.5

Email: iot@roximo.ru