

Smart X Privacy Policy

Last updated: 11/30/21

Effective date: 11/30/21

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

Before you use our Products, please carefully read through this Policy and understand our purposes and practices of collection, processing of your Personal Data, including how we use, store, share and transfer Personal Data. In the Policy you will also find ways to execute your rights of access, update, delete or protect your Personal Data.

When you accept this Policy in the registration process with your Personal Data, or if you start to use our Products and do not expressly object to the contents of this Policy, we will consider that you fully understand and agree with this Policy. If you have any questions regarding this Policy, please do not hesitate to contact us via:

Service & Privacy Concerns Department:

Smart X

smartx.iot@gmail.com

#27 St.307 Boeung Kak 2, Toul Kork Britea Bldg 6th Fl. Phnom Penh, Cambodia

Definitions

In this Policy, **Personal Data** means information generated, collected, recorded and/or stored, electronically or otherwise, that can be used to identify an individual or reflect the activity of an individual, either from that information alone, or from that information and other information we have access to about that individual.

Personal Sensitive Data includes personal biometric information, communication records and contents, health information, transaction information, and precise location information. When we collect Personal Sensitive Data from you, we will generate an explicit notification for your consent before we collection personal sensitive data about you.

Smart Devices refers to those 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.

What Personal Data Do We Collect

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

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 log-in 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.

Please note that one cannot identify a specific individual by using Device Information or Log Information alone. However, if these types of non-personal information, combined with other information, may be used to identify a specific individual, such non-personal information will be treated as Personal Data. Unless we have obtained your consent or unless otherwise provided by data protection laws and regulations, we will anonymize and desensitize such non-personal information.

- Location Information: When you enable location-based functions through permission settings on your mobile device, we will collect and process your location information to enable certain functions, such as pairing with your Smart Devices. Also, we may collect information about your real-time precise or non-precise geo-location when you use certain Smart Devices or relevant services, such as robot cleaner and weather service.

Based on your consent, when you enable the geo-fence feature on the Products, your location information will be generated and shared with Google Map services. Please note that Google has corresponding data protection measures, which you may refer to Google Data Protection Terms for more details: <https://privacy.google.com/businesses/gdprservices/>. You may reject such use of your location information by managing the permission settings in the Products, upon which we will cease to collect and use your location information.

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.
- Smart Device Setting Information: When you purchase the security related products and set the name or description, for example, such as a video doorbell, you name it "Welcome doorbell", as well as information about changing the location where the security product is pairing, and any adjustments to this setting.
- 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 purposes for which we may process your personal data about you are as follows:

- **Provide You Services:** We process your account and profile data(including information about the community services), 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.

If there is any change in the purposes for processing your personal data, we will inform such changes to you via email (specified in your account)and/or a prominent notice on our website of such changes of purposes, and choices you may have regarding your Personal Data.

Share, Transfer, Disclose Personal Data

Data Sharing

At Smart X, we only share Personal Data in ways that we tell you about. We may share your Personal Data under the following circumstances:

- 1)Obtain your explicit consent or authorization in the first place, or provide information to support for your dispute resolution with other users in accordance with your formal request;
- 2)In accordance with relevant agreements we contracted with you (including electronic agreements and corresponding Term of Use) or other legal documents provided;

3) In accordance with applicable laws and regulations, judicial procedures, and other mandatory administrative or judicial requests;

4) In order to comply with the law, execution orders, or adhere to our Term of Use and other agreements, to the extent permitted by laws and regulations, only by sharing Personal Data can protect the rights, privacy, property or security from damage for Smart X, our affiliates, partners, you or other Smart X users;

5) To protect our facilities, operations and systems and to seek remedies available for this purpose or to limit the damages we may need to provide;

6) Data sharing for the academic research;

7) Share Personal Data for the public interest in compliance with laws and regulations.

- To subsidiaries or affiliates within our corporate family, to carry out regular business activities. We will only share necessary Personal Data for said purpose, and our affiliates will also be bound by the this Privacy Policy. When they change the purposes of processing Personal Data, we will obtain your explicit consent once again so that we can further process your Personal Data.

- 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. In this respect, we share your Personal Data in a legitimate, necessary, specific and with defined purposes, meanwhile, we only share your Personal Data which are required to share. In the same time, the third-party service providers will not access to exact Personal Data about you and have no right to use Personal Data for other processing purposes which contracted with 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.

Except for the third parties described above, when we decide to share your Personal Data, only your consent can authorize us to proceed. The third parties we share Personal Data with, are required to be bound with the Non-Disclosure-Agreement, as well as this Privacy Policy to process Personal Data according to the defined instruction, security measures and confidentiality.

Data Transfer

At Smart X, we only transfer Personal Data in ways that we tell you about. We may transfer your Personal Data with the following reasons:

1) Obtain your explicit consent or authorization in the first place;

2) In accordance with applicable laws and regulations, judicial procedures, and other mandatory administrative or judicial requests;

3) In accordance with relevant agreements we contracted with you (including electronic agreements and corresponding Term of Use) or other legal documents provided;

4) 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. Under such circumstances, we will require the third

parties who have been transferred Personal Data comply with this Privacy Policy, otherwise require them to obtain your consent and authorization to process Personal Data.

Data Disclosure

We only disclose your Personal Data under the following conditions and adopt industry-standard security measures:

- 1) Upon your request and through the way you consent, we will disclose your Personal Data;
- 2) Where it is necessary to provide Personal Data in accordance with laws and regulations, mandatory administrative enforcement or judicial requirements, we may disclose Personal Data accordingly with the defined types of data and way of disclosure. Under the premise of complying with laws and regulations, when we receive the above request for disclosure of Personal Data, we will require the corresponding valid legal documents, subpoenas or investigation letters. To the extent permitted by laws and regulations, the files we disclose are protected by encryption keys.

Security Measures

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data, including but not limited to the following security measures: establishing strict internal data management systems and processes, encryption of Personal Data (including transmission, storage and processing), desensitization of the data, segregation of employees roles and duties, conducting security and privacy awareness training for our internal employees, access control and monitoring, etc., to prevent leakage, illegal usage, unauthorized access or infringement of Personal Data.

If you have a 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 us at smartx.iot@gmail.com

If a security incident affects the security of your account or Personal Data, we will promptly notify you through the email address, phone number, or Notification Center, etc., that you provided to us, and keep you informed of any suggestions to reduce or prevent related risks. When necessary, we will immediately take appropriate remedial measures in accordance with internal security response plan and report to the relevant authorities accordingly.

Individual Privacy Rights

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

Via the “Me Tab - Personal Center (Portrait); Account and Security” or via “Me Tab – Help – Report Issue” in the App;

By emailing us at smartx.iot@gmail.com

You do not have to pay a fee for executing your personal rights. According to different data protection laws, your request of personal rights will be handled within 15 business days, or within 30 calendar days due to different response requirement.

If you decide to email us, please make clear what information you would like to have changed in your request, 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;

Opt-out or object to our use of Personal Data about you where our use is based on your consent or our legitimate interests.

• **Withdrawal of consent:** We will exercise your privacy right to withdraw consent through the following approaches:

1) For privacy permissions acquired through device system settings, your consent can be withdrawn by changing device permissions, including location, camera, photo album (picture library/video library), microphone, Bluetooth settings, notifications and other related functions;

2) In the marketing communications that you agree to, the information we send to you contains instructions that allow you to withdraw your consent in accordance with the “unsubscribe” method described in the information;

3) Unbind the Smart Device through the app, and the information related to the Smart Device will not be collected;

4) By using product with the visitor mode, we will not collect any personal data about you;

When you withdraw your consent or authorization, we may not be able to continue to provide you with the products or services correspondingly. However, your withdrawal of your consent or authorization will not affect the processing of personal information based on your consent before the withdrawal.

About Delete of the Account: You can find the Delete function through “Me Tab - Click on Personal Center(Portrait) - Account and Security - Delete Account”.

International Transfer of Information Collected

Primarily, Smart X adheres to Data Localization Requirement and Minimum Data shall involve International Transfer, while in order 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. When we do so, we will ensure that an adequate level of protection is provided for the information by using the following approach:

Include but not limited to the agreement on the basis of approved EU standard contractual clauses per GDPR Art. 46. For more information, see

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

If you would like further detail on the safeguards we have in place, you can contact us directly as described in this Privacy Policy.

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.

Privacy of Young Children

Protecting the privacy of young children is especially important to us. According to the different data protection and privacy regulations, the Services are not directed to individuals under the age of eighteen (18), and we request that these individuals do not provide any Personal Data to us. We do not knowingly collect Personal Data from anyone under the age of eighteen (18) unless we first obtain permission from that child's parent or legal guardian. If we become aware that we have collected Personal Data from anyone under the age of eighteen (18) without permission from that child's parent or legal guardian, we will take steps to remove that information.

Changes to the Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices, but at least on an annual basis. Without your explicit consent, we will not undermine your privacy rights under this Privacy Policy. For any regular updates, we will provide such information in the Policy page, or Notification Center in the Application, or other appropriate channels. We encourage you to periodically review this page for the latest information on our privacy practices.

If we make any material changes we will notify you by channels that you can easily access to, for instance, email or SMS (send to the email address specified in your account) or by means of a notice on this website prior to the change becoming effective.

Contact Us

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

Smart X

Address: #27 St.307 Boeung Kak 2, Toul Kork Britea Bldg 6th Fl. Phnom Penh, Cambodia

Email: smartx.iot@gmail.com