

## **Discreet Solutions Pvt Ltd+Onetouch IoT Privacy Policy**

Last updated: the first time shall be the time for App launch in App Store; then shall be the update time for Policy

Discreet Solutions Pvt Ltd, its affiliates and subsidiaries (“we”, “us”, “our”, “Discreet Solutions Pvt Ltd”) are committed to protecting your privacy. This

**Onetouch IoT** 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”).

When you interact with our Products, please carefully read through the Privacy 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 how to execute your rights of access, update, delete or protect your Personal Data.

When you click to ‘consent’ to this privacy policy when you register with you personal data, or start and continue to use our Products in an appropriate way, and no further contrary opinions to about your concern, we will consider that you fully understand and agree to the Policy. If you have any questions raised from reading the Policy, please don’t hesitate to contact us via:

[91 9370 898 911](tel:919370898911) Telephone number or other contact information of customer service department

Privacy Office:

For other branded mobile applications powered by [Discreet Solutions Pvt Ltd](#), 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.

## Definitions

In the Privacy Policy, **Personal Data** means information recorded, 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 ID numbers, personal biometric information, bank account information, communication records and content, property information, credit information, records of whereabouts, accommodation information, health information, transaction information, and the Personal Data of minors.

**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.

## **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 part of the function of the services or even not able to provide 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 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.

If you authorize to log in the [\[Onetouch IoT\]](#) with a third party account, we will obtain your account information (such as portrait, nickname, region, gender, etc.) from the third party and bind it with your [Discreet Solutions Pvt Ltd](#) account for quick login. We will follow, on the fundamental basis adhering to the relevant data protection laws and regulations, and the agreement contracted with the third party,

as well as the terms of sharing personal information from third parties' privacy policy to process your personal information.

- **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.

- **Session data:** During your session of consultation or interaction with our business staff about products or services through the IM system, we will collect your session records and relevant information, which is limited to the following: customized session ID, session time, and your [Discreet Solutions Pvt Ltd](#). The purpose of such collection is to analyze your concerns raised during consultation, so that we can enhance and improve our IM services and identify usage trends. However, please be reminded that we will not collect any sensitive personal information related to your identity.

## **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 [[Onetouch IoT](#)] or control the Smart Device through the App, the system and exception log may be uploaded, including the IP address, the language you use, the version of mobile operating system, the time of access, etc..

Please note that device information or log information alone is not able to identify specific individual. If we combine these type of non-personal information with other information to identify, or combine it with personal information process, during the time, this type of non-personal information will be treated as personal information, unless we have obtained your consent or unless otherwise provided by data protection laws and regulations, we will anonymize and desensitize such information.

- Location Information: When you enable the location-based functions through permission setting on your mobile device, we will collect and process your location information so that you can use [[Onetouch IoT](#)] to pairing with your smart device.

We may collect information about your real-time precise or non-precise geo-location when you use our specific Products or Services, such as robot cleaner and weather service. You can reject the location permission in your mobile device to avoid the collection of 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 [Onetouch VDP](#) 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 name of the 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. To name the information that reported by this particular security product, i.e. the images or motions or videos.

### **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 type of 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 [Discreet Solutions Pvt Ltd](#), 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 [Discreet Solutions Pvt Ltd](#), our affiliates, partners, you or other [Discreet Solutions Pvt Ltd](#) 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 [Discreet Solutions Pvt Ltd](#), 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 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 [marcom@discreet.co.in](mailto:marcom@discreet.co.in).

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 fill out the route that the individual can access to provide the feedback in your App in the App;
- By emailing us at [marcom@discreet.co.in](mailto:marcom@discreet.co.in).

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.

About Delete of the Account: You can find the Delete function through fill out the route of Deletion in your App.

### **International Transfer of Information Collected**

Primarily, [Discreet Solutions Pvt Ltd](#) 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](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:

[Discreet Solutions Pvt Ltd.](#)

Postal Mailing Address: address. [B 202, Mayfair Court, Nachiket Park, Dr.](#)

[Pai's Marg, Baner, Pune, Maharashtra 411045](#)

Email: [marcom@discreet.co.in](mailto:marcom@discreet.co.in).

