<h1 style="text-align:center">PRIVACY POLICY – SMART HOME</h1>

The privacy policy is a document whose purpose is to inform you, as a user of a Delta Dore Smarthome solution, about the data which is generated, communicated and used and which may be stored. Data is used in the operation of modern electronic devices and this use is sometimes called IoT.
Using them is increasingly simple. But this does not mean close attention does not need to be paid to how they work and, in particular, how they use this data: what exactly does Delta Dore do? How has it designed its solutions? Does it take advantage of the situation to use my data at my expense?
We try to answer these questions through this document. We explain what data we use and why.

1   WHO PROCESSES YOUR DATA? - THE DATA CONTROLLER'S CONTACT DETAILS

The Data Controller of your personal data, set out in this Privacy Policy, is:

Delta Dore, a limited company (SA) registered in the Commercial Register of Saint-Malo under No. 897 080 289, whose registered office is at Le Vieux Chêne, 35270 Bonnemain.

2   FOUNDING PRINCIPLE

Delta Dore considers the data generated and handled in a Smarthome to be personal data. Indeed, Delta Dore considers that all the automation and comfort that these devices and services provide are closely linked to the lifestyle of the occupants of equipped homes.

For this reason, Delta Dore will comply with the European Data Protection Regulation, the GDPR. It aims is to carefully look after and protect its users' personal data when they use its Smarthome solutions and services.

Delta Dore processes data in accordance with the Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data. (General Data Protection Regulation) and the French Data Protection Act No. 78-17 of 6 January 1978.

But before discussing what this means exactly, it is very important to understand the key term: "processing". In the rest of this document, any operation performed on data is called "processing". Here are some concrete examples of processing:

- **generating data**, as when a motion sensor or a thermometer works
- **communicating data**, as when a switch "speaks" to a light bulb
- **using data**, as when a heater switches itself on because it has received a command
- **storing data**, as when a thermostat records what you have programmed

3   READING GUIDE

The following table shows you on which page(s) you can find relevant information:

- Chapter 4: Explanation of the processing performed and the reason for it
- Chapter 5: Description of the processed data
- Chapter 6: Purpose(s) of the processing

- Chapter 7: Data recipients
- Chapter 8: Data security
- Chapter 9: Data storage period
- Chapter 10: Your rights
- Chapter 11: Your contact person regarding your personal data

The meanings of the "key" terms written in uppercase letters are listed at the end of the document in Chapter 13.

4 PROCESSING PERFORMED, PROCESSING PURPOSES AND RELATED INFORMATION

This chapter explains the processing that Delta Dore performs. It explains why this processing is performed. And it also provides a range of important information about this processing.
For greater clarity, this chapter is organised according to the lifecycle of our users' relationship with Delta Dore: Account creation, use of products and services, help and support contact, request for a change to my installation, etc.

4.1 ADVICE, REQUESTS FOR QUOTATIONS AND CONTACTS WITH AN INSTALLER

In some situations, your home does not have a Smarthome installation. When you ask about our solutions and contact us for advice, to request a quotation or be put in contact with professional installers, we process your personal data to meet your request. These specific activities fall within the scope of our customer relationship management described in Chapter 4.9 below.

4.2 SETTING UP A SMARTHOME INSTALLATION

Several stages are necessary to make your Smarthome operational in your home:
- Installation of the devices
- Creation of an account
- Configuration of the installation

The next three chapters describe how your personal data are processed for each of these three stages.

4.2.1 Installation of the devices

The first stage involves physically installing the devices and pairing them with each other. For example, it involves indicating to a button that it is associated with a lighting point or to a thermostat that it is associated with one or more heaters. It also involves connecting the application on your smartphone to your installation.
This stage results in technical data being exchanged between devices. Indeed, as in a human relationship, they must become acquainted with each other, identify each other, and agree with each other in order to understand each other and be able to collaborate in the home.
In addition, some personal information needs to be configured so that the installation can be used easily: do you want the installation to communicate with you in a particular language? Do you want to tell the installation what time zone you are in?

4.2.2 Creating an account

In order to remotely control and monitor your home, we need to set up an account for this to work. It is through this account that our Platform makes the link between your smartphone and your home. In order to separate your information from that of other users, we associate it with your account. Nobody

has access to this data. It is used by the servers to operate the solution in accordance with the Contract we have concluded with you. Here are some examples, illustrating this need:

- Your Tydom application on your smartphone and/or tablet must be interconnected to your home installation. (Only you can see and control your installation)
- Information about the status of your installation (activations and deactivations, alerts, etc.) must be communicated so that you can view it wherever you are and in real time.
- The commands you give must be correctly passed on to your installation.
- Etc.

The information associated with your account that we process is the Tydom box identifier and the associated password. In addition, by being connected, your installation can determine for you which language is used locally and also what the time is in your home (see Chapter 4.7).

4.2.3   Smarthome device and installation configuration

The final stage involves configuring the devices so they work according to your wishes. Here are some examples:

- Home alarm: all the security devices and the alarm control unit must be configured to indicate when to trigger the alarm and conversely when not to trigger it
- Heating system: you can simply indicate what temperature you want your home to be, but you can also program the heating system to make energy savings and turn off the heating when no one is at home
- Lighting: which switches control which lighting points
- Advanced scenarios: When I leave my home, I turn off all the lights and turn off the heating
- Etc.

All the data from this set-up operation is needed to ensure the installation works and is therefore processed all the time the solution is used. This data is only accessible to those persons who have access to the devices and to those persons whose smartphone or tablet has been paired with the installation.

Also note that all your choices for personalising your user interface are saved and stored, so that your interface graphically and visually matches your needs.

4.3   MONITORING AND CONTROLLING YOUR SMARTHOME

The automation of your Smarthome, which makes life easier and gives you the comfort you want, relies on the following process:

- Sensors measure and generate status data (for example, a button measures a press, a probe measures a temperature, a detector identifies a movement, etc.). They transmit this status data to the control unit to which they are paired.
- The unit(s) use the status data received and the programs and scenarios to decide whether something needs to be done and what actions should be triggered (such as a Tydom box, a thermostat, an alarm unit, etc.). They transmit these commands to actuators.
- Actuators receive commands from the control unit to execute them (e.g. the motor of a roller shutter, a boiler, a fan, etc.).

When your installation is connected, the entire status of your installation can be viewed through your Tydom application. By navigating on it, you will be able to view the status of your installation. And you will also be able to control it by issuing specific commands. Note that this operation necessarily goes

through our Platform which is the only platform that can technically (and without human intervention) interconnect your smartphone to your remote installation.

The status data and commands are data that has a very limited lifetime: it is regularly updated according to the changing status of the installation and is only kept if a logging service is enabled. The programming and scenario data are needed for the control units so they can send out the right commands at the right times and are therefore kept for the entire time the installation is operational.

This data is only accessible to those persons who have access to the devices and to those persons whose smartphone or tablet has been paired with the installation.

4.4 VIDEO SURVEILLANCE

Our video surveillance solutions generate special personal data: videos. In fact, this is the purpose of the solution you have purchased. A video can be viewed live or saved locally on each camera's memory card. In both cases, when you view a video, at your request the video is sent securely from your home to your smartphone or tablet. Videos only pass through; they are not stored anywhere except on the cameras' memory cards.

Delta Dore wishes to draw your attention to the sensitivity of such a solution, whose installation is regulated by law: an individual who installs such a solution in their home must respect the privacy of neighbours, visitors and passers-by.

4.5 ENERGY MANAGEMENT AND CONSUMPTION

Your energy monitoring equipment is built using the principles of a French energy efficiency methodology. You can enjoy hourly readings of the electricity or gas consumption of your home for 5 levels (overall, heating, air conditioning, water heater, plugs, others) per year, per month, per day. The data generated is sent for storage purpose only on our platform for a three-year period so that you can visualize the graphs and trends on your mobile phone, comparing results year on year and possibly decide a new scheduling.

4.6 CONTROLLING MY HOME BY VOICE

Our Smarthome solutions interface with different voice assistants. In order to ensure your voice assistant and Smarthome installation coexist and work together, Delta Dore needs to exchange data with your voice assistant's operator. The technical data of the devices, status data and commands are thus shared with them. This is necessary to carry out the control in question. This data is exchanged with the operator but is not stored. Its lifetime is therefore very short, just enough time to carry out the control and monitoring operations in question.

For more information about your voice assistant operator, we recommend you read its confidentiality policy on its website.

4.7 GEOLOCATION SERVICE

Your Tydom application includes a geolocation service. This service is optional. If you activate it, it will provide you with the following:

- Geolocation allows you to automatically program the opening and closing of your shutters and switching on and off your lights at sunrise and sunset without you needing to do anything.
- Geolocation allows you to retrieve the list of available WiFi networks

- Geolocation allows you to automatically configure the time zone of your Smarthome installation

When the geolocation option is enabled, the data is stored for the time the Smarthome installation is in operation and for the time that the option remains activated.

4.8 INFORMATION ABOUT MY CONNECTED INSTALLATION

In accordance with our commitments, we will inform you in real time of changes to the operation of your installation (when it is connected). This occurs when we provide you with new features that are available using the devices you already have. Or, also when we need to upgrade the operation of our Platform, in particular, to enable them to have improved control algorithms. And finally, and this also happens exceptionally, when we need to inform you of a malfunction of our Platform.

To do so, we use all the technical options at our disposal that allow us to contact you on your application and on your smartphone. These technical options use the technological identifiers of your devices and applications that allow technical infrastructure to convey this information to users of Delta Dore solutions.

4.9 CUSTOMER RELATIONSHIP MANAGEMENT

Delta Dore wishes to maintain good customer relations. To do so, it provides various means of communication to allow you access to its help, support and expertise teams. The aim is to provide its customers with assistance as soon as they feel the need: this may be to purchase products or services, to install and operate our solutions and services, to find a professional installer, to better understand how our solutions work, to resolve a problem after they have made a mistake, etc.

A contact centre is available through our "Best Contact" partner. Delta Dore entrusts the initial contact and the resolution of the most common situations to it. To do so, we allow the "Best Contact" staff who are assigned to Delta Dore to access your data when you call us for help and assistance.

Other resources are also available, such as the contact form on the group's website and social networks that are managed and followed by our "social media managers" and through which we can respond to your requests.

In all of these cases, we use tools that allow us to create tracking sheets as soon as you contact us that are associated with your customer identity data. This allows us to know why you have contacted us and what you need and expect from us. It also allows us to track your case and view the actions taken in-house to respond to your request. For better management of our relationship with you, we keep the history of the tracking sheets.

When the subject of your request requires more specialised expertise, depending on your request, our experts will respond and we allow them to access your data.

4.10 COMMERCIAL OR MARKETING COMMUNICATIONS

Like any company, Delta Dore publicises itself, presents the characteristics of its products and services, and explains to its customers the usefulness of its solutions. This is done through so-called commercial or marketing communications.

4.11 QUESTIONNAIRES AND SURVEYS

Delta Dore may send you surveys and questionnaires about your Smarthome installation. These allow Delta Dore to improve its products and services and also to be informed of requests for innovations or changes from its users. These surveys and questionnaires are particularly necessary to assess the level of user satisfaction.

4.12 USE OF TRACKERS IN THE TYDOM APPLICATION (FOLLOW ANALYTICS)

When you use the Tydom application, some data is collected by trackers to:

- Communicate with you through the application
- Produce statistics regarding use of the application
- Improve our services

The data is collected in the Tydom application by Follow Analytics SDK and then sent to the Follow Analytics platform, which is hosted in the cloud. Follow Analytics is a mobile marketing solutions provider that allows us to send you communications via the application and follow the use of the application.

The data is sent each time the Tydom application is launched and while it is used. The data is then recorded in raw and aggregated form. When the data is aggregated, it no longer contains personal data.

4.12.1 InApp Communications

When you use the Tydom application, it collects various technical data and session data to adapt its communications, such as the language of your device.

Therefore, when Delta Dore wants to communicate with you through the application, it will do so in the language of your device. This will be the case to inform you about improvements and disruptions of your Smart Home solution and to offer you extensions of your solution.

This also allows Delta Dore to provide improved communications about disruption to your solution. Informing only certain users affected by the various problems that may occur is possible. For example, if there is a disruption to one version of the application, only users of this version will be informed.

It will also be possible for Delta Dore to adapt the information of its campaigns according to previously completed campaigns and therefore customise your experience.

The aim is to restrict communications to what is really important for you and to customise your application.

4.12.2 Production of statistics (audience measurement)

When you use the Tydom application, data is collected to produce statistics: These statistics are produced through various criteria such as the country or the mobile operator. In particular, they provide information about the number of sessions or crashes occurring to the application. They also show how you interact with the application.

These statistics are compiled to get to know you better and the equipment you use.

4.12.3 Improvement of the services

When you use the Tydom application, it may create technical information logs if a malfunction occurs. These are made available to Delta Dore's technical experts for analysis and improvement of our solutions.

5 PROCESSED DATA CATEGORIES

Delta Dore processes the User's personal data to provide the Services. The data categories concerned are set out in this article.

5.1 USER ACCOUNT DATA

- **"User identification data" category:**

  This is the data required to create the user account in the Delta Dore environment. At Delta Dore, we centralise the digital identities of the people with whom we interact. This may therefore be the digital identity relating to our Smarthome eco-system (such as the Tydom application, your home installation, a Third-party Application, the Site, or any other digital resource), or the digital identity relating to the marketing or customer relationship management.

  The data associated with the digital identities is identification data of the owner of the user account and include, in particular: the email address, first name, last name, postal address and a telephone number.

5.2 SMARTHOME INSTALLATION USE DATA

- **"Status data" category:**
  This is data generated by the devices to relay a physical quantity or status.

- **"Instructional data" category:**
  This is data sent by users or by programs and scenarios, which comprises the commands that the occupants of a home send to their devices within their Smarthome installation.

- **"Personalisation data" category:**
  These are descriptions that can be personalised, such as the names of objects, names of rooms and the name of the home
  They are also display and colour choices and preferences
  Finally, it includes the photos you send to your application to better visually represent your home.

- **"Localisation data" category:**
  This is the data that allows the installation to know where it is and provide you with appropriate services accordingly.

- **"Program and scenario data" category:**
  This is all the data that helps automate your installation and prevents you from having to give commands and instructions to your devices.

- **"Logged consumption data" category:**
  This involves storing the status data history relating to your consumption sensors (electricity, gas and water). This is intended to provide you with a visual history and also to allow you to track your consumption habits and behaviour.

- **"Logged remote alarm and alert data" category:**
  This is data processed by Delta Dore when the alarm and alert devices are used.
  This data includes, in particular: User Account data, Status data and Instructional data transmitted to the alert and alarm devices, the date and time of use of the devices, the alerts sent by Delta Dore, the identification data of the alarm and alert devices.

- **"Camera use data" category:**
  This is data processed by Delta Dore when cameras are used.
  This data includes, in particular: User Account data, instructions sent to the cameras, the images recorded by the cameras, the date and time of use of the cameras, the alerts sent by Delta Dore, the identification data of the camera devices.

5.3 TECHNICAL OPERATION DATA OF YOUR SMARTHOME INSTALLATION

- **"Objects, devices and software identification data of the Smarthome installation" category:**
  This is any digital data that uniquely identifies a device, product, service, software or application module and is part of your Smarthome installation.

- **"Technical installation and device settings data" category:**
  This is all data generated by the devices during Set Up of the Smarthome installation described in Chapter 4.2 and which allows the devices to perform their functions and interact with each other within your installation. This data is also used if a device is replaced so that your installation can be put back into service.

- **"Logged technical data" category:**
  This involves keeping a history of the technical data of the operation of the electronic devices. This data is comprised of event logs and is required by our experts to investigate any malfunction and/or breakdown of our devices included in your installation.

5.4 CUSTOMER RELATIONSHIP MANAGEMENT DATA

- **"Customer relationship management data" category:**
  This is data processed by Delta Dore when a person makes a request to Delta Dore.
  It is also the information collected when satisfaction surveys are completed.
  This data includes: User Account data and the need for it if a request is made or testimony for a satisfaction survey.

5.5 INFORMATION ABOUT THE USE OF FOLLOW ANALYTICS

- **"User technical data" category:**
  This is data generated by the application that identifies the device used and the version of the application. For example, the unique identifier of the device.

- **"User Session Data" Category**

This is the data generated for each session that the application is used. This data allows to perform statistics about the use of the application and to customise it to your use. This includes, for example, the date and duration of the session, the country, or the crashes that occur during the session.

- **"Communication campaign data" category**
  This is the data used to identify a campaign and its recipient, and to monitor it.

6 SUMMARY TABLE OF THE PROCESSING UNDERTAKEN

6.1 PROCESSING RELATING TO ADVICE, REQUESTS FOR QUOTATIONS AND CONTACTS WITH AN INSTALLER AND CUSTOMER RELATIONSHIP MANAGEMENT (DESCRIBED IN CHAPTERS 4.1 AND 4.9)

- **Purposes:**
  - Advice, requests for quotations and contacts with an installer
  - Customer relationship management
- **Legal Bases:**
  - Contract
  - Delta Dore's legitimate interest when a user's justified request is not covered by the terms of use and for the purpose of customer satisfaction
- **Data categories concerned**
  - Customer relationship management data
  - If applicable, objects, devices and software identification data of the Smarthome installation
  - If applicable, technical installation and device settings data
  - If applicable, logged technical data
  - If applicable, Smarthome installation use data

6.2 PROCESSING RELATING TO SETTING UP (DESCRIBED IN CHAPTER 4.2)

- **Purpose:**
  - Setting up
- **Legal Basis:**
  - Contract
- **Data categories concerned**
  - User Account data
  - Objects, devices and software identification data of the Smarthome installation
  - Technical installation and device settings data
  - Smarthome installation use data

6.3 PROCESSING RELATING TO MONITORING AND CONTROLLING YOUR SMARTHOME (DESCRIBED IN CHAPTER 4.3)

- **Purpose:**
  - Monitoring and controlling your Smarthome
- **Legal Basis:**
  - Contract
- **Data categories concerned**
  - User Account data

- o Objects, devices and software identification data of the Smarthome installation
- o Smarthome installation use data

6.4 PROCESSING RELATING TO VIDEO SURVEILLANCE (DESCRIBED IN CHAPTER 4.4)

- **Purpose:**
  - o Video surveillance
- **Legal Basis:**
  - o Contract
- **Data categories concerned**
  - o User Account data
  - o Objects, devices and software identification data of the Smarthome installation
  - o Smarthome installation use data
  - o Live video streams and recorded videos

6.5 PROCESSING RELATING TO ENERGY MANAGEMENT AND CONSUMPTION (DESCRIBED IN CHAPTER 4.5)

- **Purpose:**
  - o Energy management and consumption
- **Legal Basis:**
  - o Contract
- **Data categories concerned**
  - o User Account data
  - o Objects, devices and software identification data of the Smarthome installation
  - o Smarthome installation use data
  - o Logged consumption data

Processing relating to Your energy monitoring equipment is built using the principles of a French energy efficiency methodology. You can enjoy hourly readings of the electricity or gas consumption of your home for 5 levels (overall, heating, air conditioning, water heater, plugs, others) per year, per month, per day. The data generated is sent for storage purpose only on our platform for a three-year period so that you can visualize the graphs and trends on your mobile phone, comparing results year on year and possibly decide a new scheduling.

6.6 CONTROLLING MY HOME BY VOICE (DESCRIBED IN CHAPTER 0)

- **Purpose:**

Your energy monitoring equipment is built using the principles of a French energy efficiency methodology. You can enjoy hourly readings of the electricity or gas consumption of your home for 5 levels (overall, heating, air conditioning, water heater, plugs, others) per year, per month, per day. The data generated is sent for storage purpose only on our platform for a three-year period so that you can visualize the graphs and trends on your mobile phone, comparing results year on year and possibly decide a new scheduling.

- o Controlling my home by voice
- **Legal Basis:**
  - o Contract

- **Data categories concerned**
  - User Account data
  - Smarthome installation use data

6.7 PROCESSING RELATING TO GEOLOCATION SERVICE (DESCRIBED IN CHAPTER 4.7)

- **Purpose:**
  - Geolocation service
- **Legal Basis:**
  - Contract
- **Data categories concerned**
  - Location data

6.8 PROCESSING RELATING TO INFORMATION ABOUT MY CONNECTED INSTALLATION (DESCRIBED IN CHAPTER 4.8)

- **Purpose:**
  - Information about my connected installation
- **Legal basis:**
  - Contract
- **Data categories concerned**
  - User Account data
  - Objects, devices and software identification data of the Smarthome installation

6.9 PROCESSING RELATING TO THE MARKETING & COMMERCIAL COMMUNICATIONS INFORMATION ABOUT MY CONNECTED INSTALLATION (DESCRIBED IN CHAPTER 4.10)

- **Purpose:**
  - Information about my connected installation
- **Legal bases:**
  - Where marketing messages relate to products and services similar to those which the User has already purchased and the User has not objected to such messages being sent, processing is carried out on the basis of Article L. 34-5 of the Posts and Electronic Communications Code.
  - Where marketing messages relate to products and services that are not similar to those purchased by the User, processing is carried out on the basis of the User's consent.
  - Where it involves the issuance of a quotation at a prospective customer's request, Delta Dore acts in its legitimate marketing interest
- **Data categories concerned**
  - Identification data related to the User Account

6.10 PROCESSING RELATING TO THE MARKETING & COMMERCIAL COMMUNICATIONS INFORMATION ABOUT MY CONNECTED INSTALLATION (DESCRIBED IN CHAPTER 4.11)

- **Purpose:**
  - Questionnaires and surveys
- **Legal Basis:**
  - The data controller's legitimate interest: as part of the improvement of its products and services
- **Data categories concerned**

- o Identification data related to the User Account,
- o Data included in the survey or questionnaire

6.11 PROCESSING RELATED TO THE USE OF FOLLOW ANALYTICS (DESCRIBED IN CHAPTER 4.12)

- **Purposes:**
  - o Communicate through the application
  - o Adapt communications
  - o Produce statistics
  - o Improve the service

- **Legal basis:**
  - o Delta Dore's legitimate interest in communicating with its users and improving its products and services
- **Data categories concerned**
  - o User technical data
  - o User session data
  - o Communication campaign data

7 PERSONAL DATA RECIPIENTS

7.1 INTERNAL RECIPIENTS

The personal data that is the subject-matter of this Privacy Policy may be processed by the following internal departments of Delta Dore:

- research and innovation, Smarthome Platform, Smarthome Devices and Services development to provide the Services, improve the Devices and Services or carry out technical, commercial and statistical analyses of the Devices and Services

- the sales department, in particular, for greater customer awareness and customer relationship tracking

- the marketing department, in particular to improve the products and services included in a Smarthome installation, carry out statistical analyses of the Devices and Services, or send sales or marketing messages to the User

- the customer relationship department, in particular to provide support and help and to meet our customers' needs

- the legal department and senior management, in particular, to organise Delta Dore's defence in the event of a dispute or an inspection or procedure initiated by a supervisory authority

7.2 EXTERNAL RECIPIENTS

7.2.1 Delta Dore's partners

Delta Dore may communicate Smarthome installation use data to its business partners, provided that the User has given their consent.

Business partners include, in particular:

- Third parties providing their own services on the Platform or through the Platform (Third-party services as defined in the Terms of Use of the Services),
- Third-parties offering Delta Dore Services (Third-party Applications) on their own application,
- as well as installers of the Devices and Services.

7.2.2   Delta Dore's subcontractors

To provide the Services, Delta Dore uses the services of subcontractors for the following operations:

- Operational functioning of the Platform and data storage on the Platform: Microsoft Azure (more information from them on: https://www.microsoft.com/en-us/trust-center/privacy)
- Managing the User's identification data and customer relationship and associated processing: Salesforce (more information from them on: https://www.salesforce.com/company/privacy/)
- Managing data to inform Users about their Smarthome installation: FollowAnalytics (more information from them on: https://followanalytics.com/privacy/)
- Call centres, forms used for interaction with our customers, our contact "chat": MeilleurContact (more information from them on: https://meilleurcontact.com/)
- Technical tool for the operational management of our marketing operations and newsletter: Mailchimp (more information from them on: https://mailchimp.com/legal/privacy/)
- Technical tool for the operational management of our satisfaction surveys: SurveyMonkey (more information from them on: https://fr.surveymonkey.com/mp/legal/privacy-policy/)

8   DATA SECURITY AND CONFIDENTIALITY

In its data controller capacity, Delta Dore is committed to taking all necessary steps to safeguard the security and privacy of the data and, in particular, to prevent unauthorised third parties from accessing it or corrupting, disclosing or destroying it.

Thus Delta Dore has chosen to establish strong technological partnerships with security-certified actors whose security practices are regularly audited.

The services purchased from these operators guarantee availability rates and data backup and recovery capabilities that protect our customers from data loss and disruption of their Services.

Physical access to Delta Dore's premises is limited to the personnel and to persons given permission to do so by Delta Dore.

Delta Dore personnel are subject to strict non-disclosure obligations and each employee may only access the data if their duties so require.

Delta Dore regularly conducts internal audits to check the effectiveness of the technical measures adopted.

9   DATA STORAGE PERIOD

The data of a User, a Guest or a person requesting a quotation are stored for a limited period. The storage period for each data category is shown in the table below.

- Data storage periods for the "User Account Data" category:
    - All the time the installation is used and the account is active on the installation, and
    - 1 year from termination of the User Account or 1 year from the date of last use by the User
- Data storage periods for the "User Account Data collected for market research purposes" category:
    - 3 years from the last commercial activity with the User
- Data storage periods for the "Smarthome Installation Use Data" category:
    - Status data has a variable storage period that depends on the data update rate (always less than 24 hours)
    - Instructional data is used only for the time that the command executes
    - All the time it is used for:
        - personalisation data
        - location data
        - programming and scenario data
    - Camera videos: 30 days
        - 3 years for logged consumption data
- Data storage periods for the "Technical operation data of your Smarthome installation" category:
    - All the time the installation is used
- Data storage periods for the "Data relating to a quotation request" category:
    - 3 years from collection of the data when the person has not purchased any Devices and/or Services
    - 3 years from the last contact with the person when the person has purchased Devices and/or Services
- Data storage periods for the "User technical data", "User session data", and "Communication campaign data" categories are 18 months on the FollowAnalytics servers.

10   RIGHTS

In accordance with European Regulation 2016/679 of 27 April 2016 on personal data protection and the French Data Protection Act No. 78-17 of 6 January 1978, a User and a person requesting a quotation have a right of access, rectification, deletion, portability and, depending on the case, limitation and objection to their data being processed.

In addition, a User and a person who has requested a quotation may, at any time, give instructions regarding the fate of their personal data after their death.

A User and a person who has requested a quotation also have the right to file a complaint with the CNIL or the competent authority of their place of residence, if they believe that the above-mentioned regulation is not complied with.

A User and a person who has requested a quotation may exercise their rights by contacting the Data Protection Officer as specified in the following chapter.

11   DATA PROTECTION OFFICER

Delta Dore has appointed a Data Protection Officer, whose functions are defined in Chapter 4 of European Regulation 2016/679 of 27 April 2016 on personal data protection.

The Data Protection Officer may be contacted in a number of ways:

- Email: privacy@deltadore.com
- Tel.: +33 (0)2 99 73 45 17 – Ask for the "Data Protection Officer"
- Post: Data Protection Officer - Delta Dore – Le Vieux Chêne – 35270 Bonnemain

12   CHANGES TO THE PRIVACY POLICY

Delta Dore may make changes to the Privacy Policy provided that these changes are notified to the User in advance by display on the Application, Website, the User Account and/or by sending an email.

13   DEFINITIONS

"Application" means the application developed and operated by Delta Dore which makes the services of the Smarthome platform available and allows users to use them.

"Contract" means any document that provides evidence of the contractual or pre-contractual relationship between Delta Dore and the person concerned.

"Devices" means the devices connected to the Smarthome platform via a connectivity solution

"Platform" means the Smarthome Delta Dore platform developed and operated by Delta Dore used to make the services available to users and enable users to use them, such as the remote control and monitoring of one or more Devices, and third-party services via the Application, third-party applications or any other means.

"Services" means all the services on the Platform described in the "*Services*" article excluding third party services, and accessible by the Application, third-party applications or any other means.

"**Third party**" means any legal person other than Delta Dore.

"**Third-party Application**" means applications developed and operated by third parties which makes the services of the Smarthome platform available and allows users to use them.

"Third-party Services" means Services provided by third parties made available on the Platform and accessible via the Application and third-party applications.

"User" means any natural major person, or minor person, under the responsibility of their legal representative, who has a User Account opened via the Application used to use the Services or Services of third parties via the Application, third-party applications or any other means.

"**User Account**" means the account created by the user to which rights and obligations are attached which enable them to access the platform and the services that the platform makes available.