

CASAMBI PRIVACY POLICY

This Privacy Policy is applicable to the personal data processed by Casambi Technologies Oy (“**Casambi**” or “**we**”) relating to the users (“**Users**” or “**you**”) of the Casambi website and the Casambi online applications used to control Casambi enabled luminaires (website and applications hereinafter jointly referred to as “**Service**”). Such Users include application end users, website visitors as well as individuals using the Service on behalf of our business partners or customer organizations.

The purpose of this Privacy Policy is to provide Users with information about the processing of their personal data in accordance with the information obligations set in Articles 13 and 14 of the General Data Protection Regulation 2016/679 (GDPR).

Please note that this Privacy Policy only applies to processing carried out by Casambi as a data controller. This Privacy Policy does not address, and we are not responsible for, the privacy and data processing practices of any third parties.

This Privacy Policy may be updated if required in order to reflect the changes in data processing practices or otherwise. The current version can be found on our website www.casambi.com. We will not make substantial changes to this Privacy Policy or reduce the rights of Users under this Privacy Policy without providing a notice thereof.

CONTACT DETAILS

Name: Casambi Technologies Oy

Business ID: 2418753-5

Correspondence address: Bertel Jungin Aukio 1 E, 02600 Espoo, Finland

Contact: info@casambi.com

Website: Casambi.com

PERSONAL DATA PROCESSED AND SOURCES OF DATA

We collect three types of information concerning the Users: (i) account data; (ii) business representative data and (ii) analytics data.

Account data is received directly from Users in connection with the use of the Service. Account data may also be provided to us by the company or organization on behalf of which you are using the Services.

Analytics data is collected automatically as you use the Service. Although we do not normally use analytics data to identify individuals, sometimes individuals can be recognized from it, either alone or when combined or linked with account data. In such situations, analytics data shall also be considered to be personal data

under applicable laws and we will treat the combined data as personal data, and process such data in accordance with this Privacy Policy.

Casambi may process the following categories of data:

Account data:

- Account details and credentials;
- E-mail address;
- Photos where an individual can be recognized, if the User chooses to upload such photos to the Casambi application or take such photos with the Casambi application;
- Feedback and ratings (e.g. public Appstore reviews you may leave concerning the Casambi application).

Analytics data:

- IP address;
- Device type and model (computer, phone or tablet);
- Operating system;
- Time of visit;
- Browser type and version;
- Language settings;
- Metadata relating to the use of the application;
- Location data;
- Time zone;
- Settings and preferences;

Information regarding the device connecting with the application (such as hardware model, device identification number and operating system).

Business representative data:

- Name;
- Organisation and work title;
- Contact details such as email address and phone number;
- Any direct correspondence with Casambi, such as support requests;
- Direct marketing opt-outs and opt-ins.

COOKIES AND ANALYTICS TOOLS

We use various technologies to collect and store Analytics Data and other information when Users visit our Service, including cookies.

Cookies are small text files sent and saved on your device that allows us to identify visitors of our websites and facilitate the use of our Service and to create aggregate information of our visitors. This helps us to improve

our Service and better serve our Users. The cookies will not harm your device or files. We use cookies to tailor our Service and the information we provide in accordance with the individual interests of our Users.

Users may choose to set their web browser to refuse cookies, or to alert when cookies are being sent. For example, the following links provide information on how to adjust the cookie settings on some popular browsers:

[Safari](#)

[Google Chrome](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

Please note that some parts of our Service may not function properly if use of cookies is refused.

We also use Google Analytics to compile Analytics Data and reports on visitor usage. For an overview of Google Analytics, please visit [Google Analytics](#). It is possible to opt-out of Google Analytics with the following browser add-on tool: [Google Analytics opt-out add-on](#).

PURPOSES AND LEGITIMATE GROUNDS OF PROCESSING

Purposes of processing

To provide our Service and carry out our contractual obligations (legal ground: performance of a contract and legitimate interest)

We process personal data to be able to offer the Service to our Users and to run and maintain our business. Personal data may be processed in order to carry out our contractual obligations towards the User or towards the organization the User represents. We may use the data for example to offer essential functionalities of the Service and to provide access to the Service.

For our legal obligations (legal ground: compliance with a legal obligation)

We process personal data to enable us to administer and fulfil our obligations under law. This includes data processed for complying with our bookkeeping obligations and providing information to relevant authorities.

For claims handling and legal processes (legal ground: legitimate interest)

We may process personal data in relation to claims handling, debt collection and legal processes. We may also process data for the prevention of fraud, misuse of our services and for data, system and network security.

For communication and marketing (legal ground: legitimate interest)

We may process personal data for the purpose of contacting our Users regarding our Service and for informing Users of changes in our Service. We may also process personal data to market our Service, for example in the form of sending newsletters.

For quality improvement and trend analysis (legal ground: legitimate interest)

We may process information regarding the use of the Service to improve the quality of our service, for example by analysing any trends in the use of our Service. Where possible, we will do this using only aggregated, non-personally identifiable data.

Legitimate grounds for processing

We primarily process personal data of Users on a contractual basis. For Users acting as representatives of our customer or partner organizations, personal data is primarily processed based on our legitimate interest whilst fulfilling our contractual obligations towards the organisations they represent.

We may also process personal data based on our legitimate interests, for example in connection with analytics and marketing. When choosing to use your data on the basis of our legitimate interests, we weigh our own interests against your right to privacy.

In certain cases Users may be requested to grant their consent for the processing of personal data. In this event, the legal ground for such processing is your consent. You may withdraw your consent at any time.

INTERNATIONAL TRANSFERS

Casambi stores Users' personal data primarily within the European Economic Area. However, we have service providers in several geographical locations. As such, we, our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or outside of the User's domicile.

We will take steps to ensure that the Users' personal data receives an adequate level of protection in the jurisdictions in which it is processed. We provide adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

PERSONAL DATA RECIPIENTS

We do not share personal data with third parties outside of Casambi's organization unless one of the following circumstances applies:

It is necessary for the purposes set out in this Privacy Policy

To the extent that third parties need access to personal data to perform the Service, Casambi has taken appropriate contractual and organisational measures to ensure that personal data are processed exclusively for the purposes specified in this Privacy Policy and in accordance with all applicable laws and regulations.

For legal reasons

We may share personal data with third parties outside Casambi's organization if we have a good-faith belief that access to and use of the personal data is reasonably necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, security or technical issues; and/or (iii)

protect the interests, properties or safety of Casambi, our Users or the public in accordance with the law. When possible, we will inform Users about such transfer and processing.

To authorized service providers

We may share personal data to authorized service providers who perform services for us (including data storage, sales, marketing and support services). Our agreements with our service providers include commitments that the service providers agree to limit their use of personal data and to comply with privacy and security standards at least as stringent as the terms of this Privacy Policy.

For other legitimate reasons

If Casambi is involved in a merger, acquisition or asset sale, we may transfer personal data to the third party involved. However, we will continue to ensure the confidentiality of all personal data. We will give notice to all Users concerned when the personal data are transferred or become subject to a different privacy policy as soon as reasonably possible.

With explicit consent

We may share personal data with third parties outside Casambi's organization for other reasons than the ones mentioned before, when we have the User's explicit consent to do so. You have the right to withdraw this consent at all times.

Anonymous and aggregate data

Please note that the above principles regarding disclosure of data apply to personal data. We may disclose aggregate data to third parties, but solely to the extent such aggregate data is in anonymous format and does not include any personal data.

STORAGE PERIOD

Casambi does not store personal data longer than is legally permitted and necessary for the purposes of providing the Service or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing. The maximum period may therefore vary per use.

We will store Analytics Data relating to the Service no longer than reasonably necessary.

USERS' RIGHTS

Right to access

You have the right to access your personal data processed by us. You may contact us and we will inform what personal data we have collected and what personal data we process regarding you.

Right to withdraw consent

In case the processing of your personal data is based on a consent you have granted to us, you may withdraw the consent at any time. Withdrawing a consent may lead to fewer possibilities to use our services. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right to rectify

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us.

Right to erasure

You may also ask us to erase your personal data from our systems. We will comply with such request unless we have a legitimate ground to not delete the data.

Right to object

You have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the performance of the Services or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use the our Service.

Right to restriction of processing

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have legitimate grounds to process your data. This may however lead to fewer possibilities to use our Service.

Right to data portability

You have the right to receive your personal data from us in a structured and commonly used format and to independently transmit those data to a third party.

How to use the rights

The above mentioned rights may be used by sending a letter or an e-mail to us on the addresses set out above. We may request the provision of additional information necessary to confirm your identity.

We reserve the right to reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

DIRECT MARKETING

Notwithstanding any consent granted beforehand for the purposes of direct marketing, you have the right to prohibit us from using your personal data for direct marketing purposes, market research and profiling made for direct marketing purposes by contacting us on the addresses indicated above or by using the unsubscribe possibility offered in connection with any direct marketing messages.

INFORMATION SECURITY

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability restore the data. We regularly test our systems, and other assets for security vulnerabilities.

Should despite of the security measures, a security breach occur that is likely to have negative effects on your privacy, we will inform you and other affected parties, as well as relevant authorities when required by applicable data protection laws, about the breach as soon as possible.

LOGGING A COMPLAINT

In case you consider our processing of personal data to be inconsistent with the applicable data protection laws, a complaint may be lodged with the local supervisory authority for data protection.

In Finland, the local supervisory authority is the Data Protection Ombudsman (www.tietosuoja.fi).