

HOME COMFORT: CLIMATIC APPLIANCES MOBILE APPLICATION PRIVACY POLICY

This HOME COMFORT: CLIMATIC APPLIANCES Privacy Policy (hereinafter the "Policy") shall cover any and all information which the Company may obtain about the User in the use of this Application. The User's consent to the personal data provision expressed subject to this Policy within the relations with one of the Company's employees shall apply to all persons engaged by the Company.

The use of the Application shall mean the User's unconditional consent hereto and the terms and conditions for processing of his / her / its personal data specified therein, if the User does not consent hereto, the User shall refrain from using the Application.

This Policy shall be applicable only to the Application. SIA "Green Trace" (referred herein as "Company") does not control and shall not be held liable for the data (effects of their transfer) transferred by the User to a third party, if such transfer is made through a third party resource, accessible for the User by clicking on the links from the Application.

The Company shall have the right to amend this Policy by publishing a new version hereof in the Annex. The User shall be responsible for reading the current version of the Policy.

This Policy shall be governed by the law of the Russian Federation without regard to any conflict of law principles (hereinafter the Applicable Law / Legislation). If the User is located within the European Union territory, this Policy shall also be governed by the General Data Protection Regulation 2016/679 (GDPR).

1. Users' Personal Data Received and Processed by HOME COMFORT: CLIMATIC APPLIANCES Application

1.1. Within the scope of this Policy, "User's Personal Data" shall mean:

1.1.1. The personal data provided by the User about himself / herself / itself in the process of registration (account creation) or use of the Application, including the User's personal data, including, but not limited to:

- mobile phone number (when registering in the mobile application, an SMS with a confirmation code is sent to the specified number, when recovering the password, an SMS with a confirmation code is sent to the specified number).

The User may provide such information at his / her / its discretion.

1.1.2. The data which are automatically transferred to the Company in the course of their use via the Application installed onto the device, including the information from cookies, information on the User's device:

- mobile device identifier,
- information about the User's IP address and the attachment point address (for correct operation of the function of the connection of climate hardware with a Wi-Fi module to the mobile application).

1.1.3. The Application collects and stores only those personal data which are required to provide services included in the Application.

1.1.4. The Company may use the Application User's personal data for the following purposes:

- identification of the counterparty under the agreements,
- provision of customised services to the User,
- communication with the User, including sending notifications, requests, and information related to the services use and provision, as well as processing of the User's requests and applications,
- improvement of the Application quality, convenience of use, development of new services,
- statistical and other researches based on depersonalised data.

1.2. This Policy shall be applicable only to HOME COMFORT: CLIMATIC APPLIANCES Application. The Company does not control and may not be held liable for the third parties' information accessible for the User by clicking the links available in the Application.

1.3 Generally, the Company does not verify the accuracy of the personal data provided by the Users, and does not exercise control over their legal capacity. However, the Company assumes that the data transmitted by the Users are accurate and maintains this information up to date.

2. Purposes of the Users' Personal Data Collection and Processing

2.1. The Application collects and stores only those personal data which are required to provide services included in the Application.

2.2. The Company may use the Application User's personal data for the following purposes:

- 2.2.1. identification of the counterparty under the agreements,
- 2.2.2. provision of customised services to the User,

- 2.2.3. communication with the User, including sending notifications, requests, and information related to the services use and provision, as well as processing of the User's requests and applications,
- 2.2.4. improvement of the Application quality, convenience of use, development of new services,
- 2.2.5. statistical and other researches based on depersonalised data.

3. Terms and Conditions for the Users' Personal Data Collection, Processing and Transfer to Third Parties

- 3.1. HOME COMFORT: CLIMATIC APPLIANCES Application stores the Users' personal data only within the limits and subject to the legal requirements of the Russian Federation and the EU.
- 3.2. With regard to the User's personal data, the confidentiality shall be maintained, unless the User voluntarily provides the information about himself / herself / itself to the general public.
- 3.3. The Company shall have the right to transfer the User's personal data to third parties in the following cases:
 - 3.3.1. the User has expressed his / her / its consent to such actions,
 - 3.3.2. such transfer is required for the User's application of a certain service or provision of a service to the User,
 - 3.3.3. such transfer is provided for by Applicable Law within the procedure set forth thereby.

4. Change of Personal Data by the User

- 4.1. The User may change or add personal data by contacting the Company's specialists.
- 4.2. The User may also delete the personal data provided by him / her / it under a certain account.
- 4.3. The User's information may be stored on the Company's and its partners' resources during the term of the Agreement entered between the Company and the User with regard to the Application.
- 4.4. The User's personal data may be destroyed at the User's request sent to the Company's technical service in the form of an e-mail letter sent to the address dev.klimat@gmail.com.
- 4.5. The Users may, upon request, receive information from the Company regarding their personal data processing.

5. Efforts Taken to Protect Users' Personal Data

- 5.1. The Company shall take necessary and adequate administrative and technical efforts to protect the User's personal data from unauthorised or accidental access, destruction, modification, blocking, copying, distribution, as well as from any other illegal actions therewith by third parties.
- 5.2. The personal data shall be processed based on the principles of legality of the personal data processing purposes and methods, and diligence, conformance of the processed personal data volume and nature to the personal data processing methods and the personal data processing purposes.
- 5.3. The Company shall process the User's personal data subject to his / her / its consent in order to provide the services.
- 5.4. The User's personal data shall be stored only on the electronic media and used strictly for intended purpose thereof.
- 5.6 For the purposes set out herein, the Company may engage partners with which the Company has concluded appropriate confidentiality agreements on the User's data processing. The Company may transfer anonymised data on the Application use to its partners under contractual terms for the purposes of improving the Application operation.

6. Amendment of the Privacy Policy

- 6.1. The Company shall have the right to make amendments to this Policy. Upon amendment, the current version shall specify the day of the last update. The new version of the Policy shall enter into force after its publication, unless the new version of the Policy provides otherwise. The current version shall always be available at https://dongle.rusklimat.ru/privacy_policy/home_comfort/en/file.pdf.

7. Feedback. Questions and Suggestions

- All suggestions or questions regarding this Policy shall be sent to the Company's Customer Support Service to the address: dev.klimat@gmail.com.