

## EufySecurity Privacy Policy

Effective Date: [ August 8, 2023]

### Overview

We respect your privacy and handles your information with the utmost care.

This policy describes our data privacy practices for all of our Internet-connected devices and services (including all devices, linked mobile devices, and our mobile application), specifically the types of information we may collect and how we use and disclose the information. In the event of any inconsistency between the Anker Innovations Privacy Policy and this Policy, the terms of this Policy shall take precedence. Matters not expressly provided for under this Policy shall be governed by the Anker Innovations Privacy Policy. We recommended that you carefully read the Anker Innovations Privacy Policy.

Please take a moment to familiarize yourself with our privacy protection practices. For any inquiries, please contact us at <[support@eufylife.com](mailto:support@eufylife.com)>.

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I. How We Collect Your Personal Data

#### 1. Personal Data for the Provision of our Products and/or Services

We need to collect certain Personal Data from you that is strictly necessary or useful for the provision of our Products and/or Services. The table below sets out the type of information we collect and how we collect it.

#### Devices

Personal Data From You

Information Automatically Collected

Camera(eufyCam¥SoloCam¥indoorCam¥OutdoorCam¥Floodlight¥Wall Light Cam)

Contact information: such as your name, email address, shipping address and phone number when you place an order or contact us for customer service.

Device information: such as model and serial number

Photo, video, and Audio: We may need you to donate and upload your personal captures/videos and logs when dealing with certain issues.

Purchase history: warranty registration, purchase date, country, retailer purchased from, and receipt

Content of communications with you: including requests you made and other information you may include in communications with us

Location data

Logs: APP or devices usage logs, crash logs, sensor data and Scene structure information

Network information: Wi-Fi and Bluetooth data, IP address,

Device information: such as Wi-Fi List Information, Mac address, CPU information, memory information, SD card/HDD/SSD information and operating system version

Location Information: We may need your location information for activating your Camera hardware products, Bluetooth connection, time zone setting, obtain your latitude, longitude and altitude information for data analysis to provide better marketing promotion services.

Customized settings: language preferences, screentime, mode, automation, and other preference settings settings

Doorbell

Contact information: such as your name, email address, shipping address, and phone number when you place an order or contact us for customer service.

Device information: such as model and serial number

Photo, video, and Audio: We may need you to donate and upload your personal captures/videos and logs when dealing with certain issues.

Purchase history: warranty registration, purchase date, country, retailer purchased from, and receipt

Content of communications with you: including requests you made and other information you may include in communications with us

Location data

Logs: APP or devices usage logs, crash logs, sensor data and Scene structure information

Network information: Wi-Fi and Bluetooth data, IP address,

Device information: such as Wi-Fi List Information, Mac address, CPU information, memory information, SD card/HDD/SSD information and operating system version

Location Information: We may need your location information for activating your Doorbell hardware products, Bluetooth connection, time zone setting, obtain your latitude, longitude and altitude information for data analysis to provide better marketing promotion services.

Customized settings: language preferences, screentime, mode, automation, and other preference settings settings

Smart Lock

Contact information: such as your name, email address, shipping address and phone number when you place an order or contact us for customer service.

Device information: such as model and serial number, Pin Code

Photo, video, and Audio: We may need you to donate and upload your personal captures/videos and logs when dealing with certain issues.

Purchase history: warranty registration, purchase date, country, retailer purchased from, and receipt

Content of communications with you: including requests you made and other information you may include in communications with us

Location data

Fingerprint; store locally.

Logs: APP or devices usage logs, crash logs, sensor data and Scene structure information

Network information: Wi-Fi and Bluetooth data, IP address,

Device information: such as Wi-Fi List Information, Mac address, CPU information, memory information, SD card/HDD/SSD information and operating system version

Location Information: We may need your location information for activating your Smartlock hardware products, Bluetooth connection, time zone setting, obtain your latitude, longitude and altitude information for data analysis to provide better marketing promotion services.

Customized settings: language preferences, screentime, mode, automation, and other preference settings settings

Smart Tracker

Phone Location

Network information: Wi-Fi and Bluetooth data,

Device information: such as Wi-Fi List Information, memory information, SD card/HDD/SSD information and operating system version

Location Information: We may need your location information for activating your Smart Tracker hardware products, Bluetooth connection, time zone setting, obtain your latitude, longitude and altitude information for data analysis to provide better marketing promotion services.

Customized settings: language preferences, and other preference settings settings

Alarm System

Contact information: such as your name, email address, shipping address and phone number when you place an order or contact us for customer service.

Device information: such as model and serial number, Pin Code.

Audio.

Purchase history: warranty registration, purchase date, country, retailer purchased from, and receipt

Content of communications with you: including requests you made and other information you may include in communications with us

Location data

Network information: Wi-Fi and Bluetooth data, IP address,

Device information: such as Wi-Fi List Information, Mac address, CPU information, memory information, SD card/HDD/SSD information and operating system version

Location Information: We may need your location information for activating your Alarm System hardware products, Bluetooth connection, time zone setting, obtain your latitude, longitude and altitude information for data analysis to provide better marketing promotion services.

Customized settings: language preferences, screentime, mode, automation, and other preference settings settings

Smart Box

Contact information: such as your name, email address, shipping address and phone number when you place an order or contact us for customer service.

Device information: such as model and serial number, Pin Code.

Purchase history: warranty registration, purchase date, country, retailer purchased from, and receipt

Content of communications with you: including requests you made and other information you may include in communications with us

Location data

Network information: Wi-Fi and Bluetooth data, IP address,

Device information: such as Wi-Fi List Information, Mac address, CPU information, memory information, SD card/HDD/SSD information and operating system version

Location Information: We may need your location information for activating your Smart Box hardware products, Bluetooth connection, time zone setting, obtain your latitude, longitude and altitude information for data analysis to provide better marketing promotion services.

Customized settings: language preferences, screentime, mode, automation, and other preference settings settings

When using our products and services, please be aware that privacy and video surveillance laws in your area may apply. It is your responsibility to ensure that you comply with all relevant laws. For instance, you may need to post a notice informing

visitors to your home that our products or services are in use. Recording or sharing video or audio content that includes other individuals, or capturing their facial features, may impact their privacy rights.

## Device Sharing

When you share the devices you have added in the APP with other users, they may gain access to your personal information, such as [account/user name/e-mail address/device information]. Additionally, we may collect and process the personal information of these users, such as [account/user name/e-mail address]. Therefore, please inform and obtain consent from others before sharing.

When you accept the device sharing invitation from other users, we may collect and process your personal information, such as [account/user name/e-mail address].

## 2. Permissions

Our App may request your permission to access your mobile device's connection information, storage capabilities, sensors or other features. We only require access when it is necessary or useful for the provision of our Services:

Wi-Fi, Internet and Bluetooth -- The App requires Wi-Fi, Internet, and Bluetooth permissions to link the App to the device, and to connect your system to our server. Blocking these permissions would impair the functions of our devices.

Camera and photos -- The App may require access to your mobile device's camera or photo gallery to enable certain functions, such as saving the video or picture that you record or capture.

Microphone -- The App may seek permission to access your mobile device's microphone to enable certain features. You may refuse to give permission or withdraw your permission at any time through the privacy settings of your mobile device.

Location -- The App requires location permission to automatically fill in your Wi-Fi network during the setup of the device.

Push notification -- The App seeks your permission for push notification on your mobile device, which will be used to notify you about the status of your device.

Face ID-- The APP requires Face ID permission on your IOS system to automatically log in your APP.

Storage-- The APP seeks your permission for accessing photos, media and files on your devices.

You may change the permission settings at any time under the settings of your operating system, but please be informed that revoking permissions may affect the provision and performance of our Services.

## 3. Legal Basis for Processing Personal Data

Purpose

Type of Personal Data

Legal Basis for Processing Personal Data

Account registration

Your identity

Your contact

Login information (username and password)

Performance of a contract with you

Device connection and settings control

Device technical data: device specifications, operating system, device name, device model, serial number, sensor data, status and mode, software version, battery level, CPU data, SD card data, storage, and mobile device data

Wi-Fi, Internet and Bluetooth connection information

Account data: login credentials, subscriptions

Contact information

Performance of a contract with you

Device operation

Device technical data: device specifications, operating system, device name, device model, serial number, sensor data, status and mode, software version, battery level, CPU data, SD card data, storage, and mobile device data

Wi-Fi, Internet and Bluetooth connection information

Location data

Sensor information

Camera and photos

Usage data: device and App log files, settings (including settings history), usage history, device and service settings, and device status

Performance of a contract with you

Product warranty

Device technical data: device specifications, operating system, device name, device model, serial number, status and mode, and battery level

Account data

Purchase history: purchase date, country, retailer purchased from, receipt, subscriptions, warranty registration information

Performance of a contract with you

Customizing your experience

Account data

Pictures: where you choose to upload a profile picture

Preferences settings: language, unit and scales

Necessary for our legitimate interest (to make our devices and services more user-friendly)

Maintain and protect our services

Device technical data

Usage data

Necessary for our legitimate interest (network security, preventing fraud, provision of administration and IT services, and running our business.)

Communicate with customers

Contact information

Content of communications

Audio

Account data



Device data

Usage data

Necessary for our legitimate interest (to respond to your requests, customers' reviews, and update our products/services)

## II. How We Use Your Personal Data

### 1. By Devices or Systems

We process your Personal Data as necessary for the provision of our Services and the performance of our contract with you. For example, we need to process your personal information to enable the following:

Provide our Services, such as registering you for a Service, identifying and authenticating you, setting up your device, connecting your device to the network, enabling device sharing function, personalizing settings, operating the device, checking on the status of the device, and sending usage notifications to you (including push notifications);

Loyalty and incentive programs;

Provide customer support and communicate with you, which includes functions enabling you to provide reviews of our products and feedback;

Crash reports are reports sent to our server when you report an error to us and with your consent. We need certain information in order to identify the cause of the issue to assist you. Information required includes device data, usage history and logs, device settings, error reports, abnormal activities reports, and account information;

Operate, evaluate and improve our business, including developing software updates, developing new products and services, analyzing our Services, aggregating and anonymizing data, performing data analytics, auditing and other internal functions;

Network security, specifically for the prevention, detection, and protection against fraud, abuse, criminal activities, and other abnormal activities;

Comply with regulation requirements, enforcement and compliance with legal requirements, for the execution of claims, including relevant industry standards, and our policies;

For administrative purposes, including quality assurance purposes and internal training; "Help Us Improve Our Service" program, uploads information to the cloud server, which will be subsequently processed for the purpose of internal quality control and to help us develop our products and services.

Marketing and advertising, such as providing product and service recommendations, which may include targeted ads. You may turn off targeted or interest-based advertising by communicating that request to us at <[support@eufylife.com](mailto:support@eufylife.com)>

We may combine information we obtain about you for the purposes described above. We may also use the information we obtain for other purposes for which we provide specific notice at the time of collection or otherwise with your consent.

## 2. Your Personal Data Used Across Connected Devices

Our products use data from your connected devices to give you a more personalised experience.

For example: [Home/Away Assist & Home and Away Routines uses activity sensors across multiple Camera devices in your home to automatically switch the behavior of Camera devices in your home when you leave and when you come back.

## III. How We Share Your Information

### 1. Third-Parties

Some parts of our services rely on the third-party service providers (such as email service providers; payment services providers; shipping companies; postal carriers; etc.) and thus require us to share some of your personal information with them. These third-parties are subject to confidentiality obligations, limiting their use and disclosure of your information.

Data Shared

Purpose

Third Party

Email, order information, payment information

Complete shopping mall functions such as product sales transactions and product shipments

Shopify Inc.

Mobile device information

Record the distribution and statistical functions of user mobile phone access flow, number of users, models, etc. during app operations; Simultaneously supporting the grayscale publishing strategy provided by Apple during the APP publishing process

Google Inc.

Email, Chat log

Record and follow up on resolving user issues.

Salesforce, Inc.

## Mobile device information

Record the distribution and statistical functions of user mobile phone access flow, user number, model, etc. during app operations; Simultaneously supporting the grayscale publishing strategy provided by Apple during the APP publishing process

Apple Inc.

Email, thumbnail, cloud video

maintain the normal use of product functions, including system mail push, device event message push and Cloud storage video storage

Amazon.com, Inc.

Mobile device information, user ID

maintain the normal use of product functions, including system mail push, device event message push and Cloud storage video storage

Google Inc.

Email, credit card/savings card number

maintain the normal use of product functions, including system mail push, device event message push and Cloud storage video storage

Stripe, Inc.

cell-phone number

Cloud storage service

Hangzhou Alibaba Advertising Co., Ltd

Display Personal Data on third parties apps :

We display Personal Data ( location data ) on the following of other third parties for legitimate business purposes and the operation of our Sites , Apps , products , or services to you , in accordance with applicable law :

Third party apps : Find My App ( on IOS ) , and etc

Your Personal Data won't be shared with any other third parties unless you choose to

share it through our services .

## 2. Legal compliance

We may share your personal information in certain circumstances, including:

To law enforcement authorities, government or public agencies or officials, regulators, and/or any other person or entity with appropriate legal authority or justification for receipt of such information, if required or permitted to do so by law or legal process; When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity;

When the information is required for the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, or for the enforcement of civil law claims.

## 3. Transfers

If the ownership of all or substantially all of our company's business, or individual business units or assets owned by our company that is related to the Services, were to change, or a bankruptcy or other change were to occur, your Personal Information may be transferred to the new owner or may be shared during such transaction (such as during due diligence) even if such transaction is not completed. In any such transfer of information, your Personal Information will remain subject to this Privacy Policy unless and until changed according to the terms herein.

## 4. Information You Disclose

Our device-sharing function allows you to share information with other people. You have control over how you share and to whom you share your information. We recommend you only share information with people you trust.

## IV. Retention and Disposal of Your Information

We will retain your personal information for a period necessary to fulfil the purpose for which it was collected, until you remove your data, or for a period required by applicable regulations. When we no longer require your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

## V. Your Rights

Subject to applicable law, you may have the following rights regarding the Processing of your relevant Personal Data :

#### 1. Right to Access

You have the right to obtain confirmation from us that we process your personal information and, if so, you may have the right to request access to your personal information.

#### 2. Right to Rectification

You have the right to request that we rectify inaccurate personal information concerning you and, depending on the purposes of the processing, you may have the right to have incomplete personal information completed.

#### 3. Right to Erasure

You have the right to request us to erase some or all of the personal information concerning you.

#### 4. Right to Restrict Processing

You have the right to request us to restrict the further processing of your personal information. In such cases, the respective information will be marked as restricted, and may only be processed by us for certain purposes.

#### 5. Right to Data Portability

You have the right to object, on grounds relating to your particular situation, to the processing of your personal information by us, and we may be required to no longer process some or all of your personal information.

#### 6. Right to Object to Directive Marketing

You have the right to object to the processing of personal information for direct marketing purposes.

#### 7. Right to Object to Decision Based Solely on Automated Processing

You have the right not to be subject to a decision based solely on automated processing where the decision has a significant legal impact on you.

#### 8. Right to Object to Processing

You have the right to object to the processing of your data if the data is processed based on necessity for the performance of a task carried out in public interest or necessity for our's or third-party's legitimate interests.

## 9. Right to Withdraw Consent

You have the right to withdraw consent you have provided to us where we rely solely on your consent to process your personal information. You can always provide your consent to us again at a later time. Please note that the withdrawal will not affect the processing of data based on prior consent.

## 10. Right to Lodge a Complaint with Supervisory Authority

If you have questions or concerns with respect to our Privacy Policy, please read this Policy first. For additional questions, you may contact us at <[support@eufylife.com](mailto:support@eufylife.com)> or [DPO@anker.com](mailto:DPO@anker.com). Please note that we take your satisfaction very seriously. Should you have a complaint, please also direct it to the same email address and we will respond to you as soon as we can. You can, of course, also lodge a complaint with the data protection authority of the country in which you live. Please find a list of data protection authorities in EEA via this [LINK](#) and UK via this [LINK](#).

## VI. Children's Data Protection

### 1. Background

We recognize the importance of protecting children's data privacy. We define "children" as (i) anyone under the age of 16 residing in Europe; or (ii) anyone under 13 residing outside of Europe.

### 2. Children's Information We Collect

#### A. From You

Our device does not actively ask for your child's information. However, we are aware that the microphone and camera on our device may incidentally include footage of children. Please review the Children's Data Protection section, which describes how we collect and handle data which may contain children's information.

Our Services are not intended to be operated by children nor do we knowingly collect children's personal information for the provision of our Services or the operation of our devices. If you become aware that your child has provided us with personal information without your consent, please contact us here <[support@eufylife.com](mailto:support@eufylife.com)>. If we become aware that a child has provided us with personal data, we will delete the data from our system.

### 3. How We Protect Children's Information

We place great importance on the security of children's information. We use technical security measures to prevent the loss, misuse, alteration or unauthorized disclosure of information under our control. We use technical and organizational security measures, including and not limited to encryption, strict access control, and secured transmission protocol.

### VII. International Transfer of Data

Your information may be processed and stored outside of the country where you live, where we have facilities or where we have service providers, including China, the EU, the UK, and the US. The data protection rules in these countries may be different from those in the country where you reside.

If you are located in the EEA, we may transfer your data to our affiliates in countries recognized by the European Commission as providing adequate personal data protection. We rely on the following adequate decisions in this case: European Commission adequacy decision; UK adequacy regulations; Swiss adequacy decisions]

[Standard Contractual Clauses (SCCs) are standardised and data protection clauses approved by the European Commission that allow controllers and processors to transfer data in compliance with EU data protection law. We have put in place measures and agreements to protect your personal data. To obtain a copy of the documents, please contact [support@eufylife.com](mailto:support@eufylife.com).

### VIII. Updates to the Privacy Policy

This Privacy Policy went into effect on the "Last Revised" date noted near the top of this page. We may update our Privacy Policy from time to time. We encourage you to look for updates and changes to this Statement by checking the "Last Revised" date when you access our websites or mobile applications. If we make material changes to how we treat our users' personal information, we will notify you by notice in the App.

### IX. Contact Us

If you have any questions or comments about this Privacy Policy or our privacy practice, please contact:

[[DPO@anker.com](mailto:DPO@anker.com)] or [[support@eufylife.com](mailto:support@eufylife.com)]

We answer all inquiries and concerns within 30 days.