

**PRIVACY POLICY**

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Latest update: 10/01/2020

The Application Door Entry EASYKIT (“the Application”) is hosted on the servers of Microsoft Azure.

## IDENTITY OF THE JOINT DATA CONTROLLERS

The processing of personal data collected is carried out under the responsibility of:

- Legrand SNC**  
 128, av. du Maréchal de Lattre de Tassigny  
 87045 Limoges Cedex (France)  
 email: [webmaster.legrand@legrand.fr](mailto:webmaster.legrand@legrand.fr)  
 General Partnership with capital of €6,938,885  
 SIRET No. (Business reg.) 389 290 586 000 12  
 APE Code (Business category) 4669 A  
 Registered with the Limoges Trade and Companies Register under No. B 389 290 586  
 VAT ID No. FR 15 389 290 586
- BTicino S.p.A.**  
 Viale Borri, n° 231  
 21100 Varese – Italia  
 Fax: +39 0332 423675  
 E-mail: [privacy@pec.bticino.it](mailto:privacy@pec.bticino.it)

## DATA COLLECTED AND PURPOSE OF DATA PROCESSING

Data that you communicate to us

Data collected	Purpose of data processing	Legal basis of data processing
Name*, Surname*, E-mail address*, Country*, Password* (crypted)	<b>Creation of your user account</b>	<b>Contract</b>
Topology of the plant Includes: - MAC Address, - Firmware version - Hardware version - Activation date - Device model - Last seen date - Status of the device - Friendly name - SCS Address	<b>Management of the service</b>	<b>Legitimate interest in continuously improving our products, services and client relations</b>
	<b>Direct marketing</b>	<b>Consent</b>

	<p>You can oppose to this processing every time you receive our communications and at any time by following the procedure set out in the <a href="#">Exercise of users' rights section</a></p>	
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\* Mandatory data

Data identified as mandatory are collected on the contract basis and are essential for providing the service. Failure to fill in a mandatory field will result in compromising the creation of your user account.

When you provide us with optional data, you have the right to object to their processing at any time by following the procedure detailed in the section "[Exercise of users' rights](#)".

We retain the data that you communicate us for the time period necessary to the performance of our services and for a maximum of 1 month after deletion of your account on our Application.

Uninstalling your Application does not erase your data immediately. To have your data deleted, please follow the procedure set out in the [Exercise of users' rights](#) section below.

## IN-APP COMMUNICATIONS AND PUSH NOTIFICATIONS

- In-App Communications

From time to time, commercial and/or operational communications are sent directly to your Mobile Application. Depending on the nature of such communications, this processing activity is performed on the legal basis of the relevant legitimate interest of the Data Controllers.

We also inform you that, on the basis of our legitimate interest in improving our communications, we will collect the language that you have set on your device to adapt the language of our communications.
- Push Notifications

After the creation of your account, you will be asked to indicate whether or not you wish to enable service-related push notifications. Please note that such notifications are optional and can be disabled at any time from your device.

## EXERCISE OF USERS' RIGHTS

You have a right to access, rectify or delete your personal data. You can request that their processing be restricted or object to them being processed. When we rely on your consent to perform a particular processing, you can withdraw such consent at any time.

If you request the erasure, or object to the processing of data necessary to the performance of our services and/or specified as mandatory, you will no longer be able to use the Application, as it requires the processing of these data in order to operate.

Should you so request, we may send you the personal data that you have provided to us in an easily accessible format.

You may exercise your rights at any time, subject to the production of valid supporting documents, by sending your request to our Data Protection Officer by e-mail to [dpo@pec.bticino.it](mailto:dpo@pec.bticino.it).

Your request will be processed within one month of receipt. If necessary, this period can be extended by two months, in view of the complexity and the number of requests. In this case, you will be informed of this extension and its reasons within one month of receipt of the request.

No payment will be required for the exercise of your rights except in case of manifestly unfounded or excessive demand. In this case, the Legrand Group further reserves the right to not respond to your request.

In the event you remain dissatisfied with our response, we remind you that you have the right to lodge a complaint with your local data protection authority.

## **CONDITIONS OF DATA PROCESSING**

The personal data are processed with the help of manual and computer tools.

### **ACCESS TO DATA**

Only the following have access to your personal data, within the limits of their respective assignments:

- Internal departments of the Legrand company established in France and Bticino company established in Italy: Research and Development teams in charge of Customer support; IT Department;
- Internal departments of the company Bticino established in Italy: teams in charge of the Application for the purpose of managing said Application; the department in charge of marketing operations for the purpose of commercial prospecting and customer management, persons in charge of answering data protection requests;
- Marketing teams of the Legrand company established in France and Bticino company established in Italy;
- The service provider Microsoft AZURE, responsible for hosting the Legrand Cloud. We inform you that Microsoft benefits from a “Privacy Shield” certificate and as

such, any possible transfer of your data for hosting purposes in the United States will take place under security and privacy conditions which are considered adequate according to European legislation;

- Google as a cookie provider and Analytics, insofar as they have access to your browsing history on our Application should you consent to such access through or “cookie pop-up”. We also inform you that Google benefits from a “Privacy Shield” certificate and as such, any potential transfer of your data for hosting purposes in the United States will take place under security and privacy conditions which are considered adequate according to European legislation. To learn more, please consult our “Types of cookies” section below.

We inform you that the aforementioned service providers are bound by an obligation of confidentiality and may only process your data in compliance with our contractual provisions and the applicable legislation.

The Police, a government department, local authority, or another legitimate authority may also be required to share your Personal Data if and when it is necessary in order to protect your vital interests or those of another natural person, if it is necessary for compliance with a legal obligation to which it is subject or for the establishment, exercise or defence of legal claims.

### **THIRD-PARTY PARTNER SERVICES**

You may subscribe to services provided by Third-party Partner Service Providers. When you decide to use these Services, you shall grant a delegation for access to data available in the BTicino and Legrand cloud since we do not share your data with Third-Parties without your express consent. Such subscription will be subject to the acceptance of the specific terms of use of the Third-party Partner Service Provider. In this case, the user recognises that Bticino does not own and has no control over these Third-party Partner Service Providers and that Bticino is not responsible for data processing performed by these Third-party Service Providers. To learn more about the manner in which these Third-party Partner Service Providers process your personal data, we advise you to consult their applicable privacy policies.

### **DATA SECURITY**

The LEGRAND Group has implemented adequate physical, electronic and administrative protection measures that comply with the regulations in order to protect your personal data. The LEGRAND Group would like to draw the users' attention to the potential risks in terms of data confidentiality linked to Internet use. It is the responsibility of the user to set up or ensure the use of a personal secured computer network, as well as to ensure a correct technical configuration of the connection box connected to your Internet service provider and of other devices such as radio access equipment (e.g. WIFI, 4G, etc.).

# COOKIES AND SIMILAR TECHNOLOGIES

While you are browsing, cookies are stored on your device (computer, mobile phone, tablet), subject to the choice you have made and that you can change at any time by managing your settings (see Accept or reject cookies”).

Placed on your terminal when you use the Application, a cookie is a small text file containing information about your browsing (pages viewed, date and time of the consultation, etc.), whose main purpose is to enhance your visit and allow you to receive targeted services. The term “cookie” refers more largely to cookies, trackers, pixels, bugs and other similar technologies.

## Types of cookies

- Internal cookies required for the Application to operate

Name	Description	Retention
access_token	Legrand: server access token	Time to live: 1h
refresh_token	Legrand: server refresh token	Time to live: 14 days
Crashlytics	Google: bug reporting tool enabling detection of crashes	Retention of data: 90 days
Graylog	Legrand: logs collecting server manually sent to remote server by the user.	Retention of data (on Smartphone): 10000 text lines (Android) 300 text lines (iOS)  Retention time of data on cloud: 24 months

These cookies are strictly necessary to the functioning of the Application.

The personal data (list the personal data collected by such cookies, for example: unique ID of cookies, session ID) is collected and processed on the contract basis.

- Audience measurement cookies

app_clear_data app_exception app_remove app_update dbg_certificate_expired dbg_linphone_push dbg_linphone_push_empty dbg_linphone_wrong_call dbg_linphone_wrong_push first_open os_update rating_dismissed rating_displayed	GOOGLE ANALYTICS: used to record anonymous information to produce global statistics about the equipment and the system usage	50 days
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rating_negative_feedback rating_negative_store rating_positive_feedback rating_positive_store rating_rated ringtone_changed screen_view session_start vde_autoswitching_local vde_autoswitching_remote vde_call_answer_local vde_call_answer_remote vde_call_home_local vde_call_home_remote vde_doorlock_local vde_doorlock_remote vde_missed_call_local vde_missed_call_remote vde_setup_activation vde_setup_camera vde_setup_lock vde_setup_tvcc		
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We inform you that we can only access the following personal data: (list the personal data collected by such cookies, for example: unique ID of cookie, IP address, information about the user’s equipment and activities performed on the application (first and last visit, length of visit, time of arrival and departure etc.).

When you consent to the deposit of such cookies through our “cookies pop-up”, this shall constitute the legal basis of the processing. You can decide to withdraw such consent at any time by following the procedure set out in the “Accept or refuse cookies” section.

**Accept or reject cookies**

When using your web app, you may configure your browser so that cookies are recorded on your device or rejected, either systematically, or according to their issuer, or so that you are informed when a cookie is recorded on your device, in order to enable you to accept or refuse it. However, the deletion of all cookies used may lead to the alteration or loss of certain settings or information and make browsing difficult or even impossible.

Should you give your consent to the reading of data provided by analytics tools on your mobile application, note that you can withdraw such consent at anytime by managing your settings directly within your application.

## **UNDER FIFTEEN**

When offering information society services, the LEGRAND Group does not target minors under the age of 15 as a user group. However, access to such Services is not restricted to adults since their contents are not prohibited for minors.

The LEGRAND Group does not knowingly gather or use any personal information from children under 15. If information is gathered concerning a minor, the minor's legal representative has the possibility to contact the DPO of the LEGRAND Group in order to access, rectify, modify or delete this information (see "Exercise of user's rights" below for more information).

## **AMENDMENT TO THIS DOCUMENT**

Should the present document be modified, you will be informed of such modification and will be asked to renew your consent to the terms of this document.