

Atamate Privacy Policy

Atamate Limited (“**Atamate**”) takes your privacy very seriously. We respect your privacy and want you to understand how we use the personal information that we hold about you.

We ask that you read this privacy policy carefully as it contains important information about what to expect when Atamate collects personal information about you and how Atamate will use your personal data.

Atamate is part of a group of companies which includes Shotover Technologies Limited.

This policy applies to information we collect about:

- visitors to our website; and
- people who do business with us, including those that contract to receive our integrated building automation system service.

1 The information we collect about you

When you do business with us, including contract to receive our integrated building automation system service, we collect the following personal information from you:

- 1.1** your name;
- 1.2** your contact details, including: email address, telephone number, and postal address(es) associated with your account or order;
- 1.3** details of the products and services that you purchase from us;

We will also collect some or all of the following information, as relevant to the provision of the services that you receive from us:

- 1.4** payment information, including: bank account details, credit card number and expiry date;
- 1.5** information relating to the delivery of the services (including any hardware) to you;
- 1.6** information relating to the installation of any hardware relating to the services at your property, and any servicing of such hardware;
- 1.7** information relating to the layout of your property as required to enable to enable the provision of the services to you, including the configuration of systems that are controlled by our integrated building automation system;
- 1.8** information about how our products and services are used at your property, including the performance of our products and services. Information collected may include: data concerning heating, ventilation, hot water, lighting, access (doors and gates), security, windows and shading, occupancy, swimming pools and garden equipment (sprinklers, fountains, etc) and other equipment connected to the system such as Audio or CCTV. Certain of our products may also rely upon us using location data from your mobile device to indicate when you are outside your property;
- 1.9** information about the electronic devices (including computers, or smartphones or other mobile telephones) that you connect to our products (including via the download of one of our apps) or to our website, including: the operating system, the browser, any applications that connect to our products, details of your internet provider, the IP address and your mobile network. We will also collect information about how your devices are being used with our products;
- 1.10** information about your use of our apps, and which parts of our website you access;
- 1.11** records of your discussions with our customer services team, whether oral or written (including through our social media platforms), including: comments and opinions that you may share about the provision of the services, complaints you may make or questions you may ask. Telephone conversations may be recorded for training purposes, and to allow us to improve our services.

Where you are given the option to share any of the above information with us, you are not obliged to do so. If you object to any particular use of this information by us, or if you have provided your consent to processing and you later choose to withdraw it, we will respect your choice in accordance with our legal obligations. However, this could result in us being unable to perform some (or all) of the actions necessary to achieve the purposes set out below in the section *“How we will use the information about you”*, and/or in you being unable to make use of some or all of the products and services offered by us.

In addition to collecting information directly from you (such as when you create your account, use any of our products or services, or otherwise contact us), we may also collect information from installers or service engineers that support your system. Third party products and apps may also provide us with information when you use them in connection with our products.

2 How we will use the information about you

We process your information where you consent to us doing so. However, there are a number of instances where we do not require your consent to engage in the processing or disclosure of your information. We may not solicit your consent for the processing or transfer of your information for those purposes which have a statutory basis, such as:

- the transfer or processing of your information is necessary for the performance of a contract (i) made between you and Atamate (or one of its affiliates), or (ii) that has been concluded in your interest and made between Atamate (or one of its affiliates) and a third party;
- the transfer or processing of your information is necessary to allow us to process your registration, process any orders you may make or other transactions (including to take payment), instal and provide the services requested, and/or maintain your account. The relevant information is then used by us, our agents and sub-contractors to provide you with statements of your account, and to communicate with you on any matter relating to the conduct of your account and the provision of the services.
- We need to use your information to establish or maintain communications with you, including to respond to your questions and complaints, and to investigate and respond to any misuse or abuse of your account (including fraud).

If you agree, we may also contact you about other products and services we think may be of interest to you, based on our review of your information.

From time to time we may use information about how you use our products and services, and/or provide it to our customer service agencies, for research and analysis purposes so that we can monitor and improve the services that we provide. We or our agents and sub-contractors may contact you by post, email or telephone to ask you for your feedback and comments on our services.

We may also use aggregate information and statistics for the purposes of monitoring the use of our services and our website usage, in order to help us understand how they are used and to develop and improve them, and we may provide such aggregate information to third parties. These statistics will not include information that can be used to identify you .

Sharing your information with others

In addition to those mentioned above, we may share personal information with the following:-

- other companies in our group, in order to provide the services to you and

- understand your use of our products and services;
- third party suppliers, installers, service engineers and delivery companies, to enable them to provide their services to you, including in respect of our products;
- other providers of services to us, including companies that: provide IT support, process payments; analyse data; provide financial or legal advice; send communications to customers; engage in market research;
- regulators, other government bodies, or law enforcement, where we are required to do so.

3 Marketing

We and our group companies may also wish to provide you with information (via email, text, push notification, mail or telephone) about special features of our website or any other service or products we think may be of interest to you, in accordance with your preferences. If you would rather not receive this information, please send an email message to **support@atamate.com** or contact our customer services team. If you agree to us providing you with marketing information, you can always opt out at a later date.

We may also want to provide you with related information from third parties we think may be of interest to you. If you would rather not receive this information, please send an email to **support@atamate.com** or contact our customer services team. If you agree to us providing you with third party marketing information, you can always opt out at a later date.

We may also provide your information to carefully selected third parties whose products or services we believe may be of interest to you. If you do not wish us to disclose your information in this way, please send an email to **support@atamate.com** or contact our customer services team.

4 Our use of cookies and other information-gathering technologies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information; we use cookies and other similar technologies in relation to our website. The information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function if you remove cookies from your browser.

5 How we protect your information

We have put in place the following security procedures and technical and organisational measures to safeguard your personal information: Data is stored on Google Cloud Platform servers, protected by passwords and a firewall preventing access by any protocol apart from HTTPS and SSH. SSH access is only allowed using authorised RSA keys.

We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

6 Overseas transfers

The information you provide may be transferred to countries outside the European Economic Area (EEA) that do not have similar protections in place regarding your data

and restrictions on its use as set out in this policy, including the United States of America. However, we will take all reasonable steps to ensure adequate protections are in place to ensure the security of your information when transferred to these countries. By submitting your information you consent to the transfer, processing or storage of information outside of your country and outside the EEA for the purposes specified above.

The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

7 Access to your information and updating and correcting your information

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email to **support@atamate.com**. We may make a small charge for this service.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to Atamate changes (for example if you change your email address, name or payment details), or if you wish to cancel your registration, please let us know the correct details by sending an email to **support@atamate.com**. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

8 Your rights regarding your information

Including as stated above, you have the following rights with regard to your personal information:

- the right to access your personal information that we hold;
- the right to be informed how your personal information is used;
- the right to request corrections to inaccuracies in your personal information that we hold;
- the right to request that we cease to hold certain of your personal information, understanding that this may cause the functionality of our products may be reduced, or to not be usable at all;
- the right to opt out of receiving direct marketing messages.

To exercise any of the above rights, please contact us as set out in Sections 7 and 3 above.

You also have the right to contact the UK Information Commissioner's Office (or your local data protection regulator) if you are unhappy with how we are using your personal information, though we encourage you to contact us first, where we will do our best to address your concerns.

9 How long we keep your personal information

We will retain your personal information for the duration of your account with us . After you close your account, we will retain your personal information for a reasonable period, in order to fulfil our contractual and legal obligations to you, and to maintain our records.

10 Your consent

By submitting your personal information you consent to the use of that information as set out in this policy.

11 Changes to privacy policy

We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on this page, and place notices on other pages of the website, so

that you may be aware of the information we collect and how we use it at all times. We will indicate any material changes by updating the version date in this Section 11. This privacy policy was last updated on 5th August 2019.

12 How to contact Atamate

We welcome your views about our website and our privacy policy. In addition to as set out in Sections 3 and 7, if you would like to contact us with any queries, comments or complaints, please send an email to [**support@atamate.com**](mailto:support@atamate.com).

13 Service notifications

Some of our apps may send service notifications directly to your electronic device (through the relevant app, by email and/or by text, in accordance with your preferences) when we have something important or of interest to share with you, or where you have asked to be notified of events relating to the operation of the system at your property. At any time you can turn off service notifications through the relevant app, through your online account or via the system settings of your electronic device.

14 Links to other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

15 Sale of business

If Atamate's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business .