

## Rollesee Acmeda Privacy Policy (EU)

### 1. Policy scope and updates

This is the privacy policy for Rollesee Acmeda srl (Europe Division) ( '**Rollesee Acmeda**', '**we**', '**us**', '**our**'). This Privacy Policy applies to the services Rollesee Acmeda provides through this and other Rollesee Acmeda websites, mobile device applications (apps) and IoT (Internet of Things) integrations, such as Google Home, Alexa and Smart Things, to customers in the European Economic Area (**EEA**). This Privacy Policy does not apply to Rollesee Acmeda Pty Ltd (Australia Division), Rollesee Acmeda Inc. (USA Division), GCM Pty Ltd (trading as Texstyle Australia) or any of our non-European operations. Please refer to the main Rollesee Acmeda Privacy Policy for information about how these entities collect and use personal information.

Rollesee Acmeda is committed to protecting the privacy of individuals with whom it deals and this Privacy Policy supports its handling of the personal information it collects and holds in accordance with applicable privacy laws.

This Privacy Policy explains how and for what purpose Rollesee Acmeda collects information about you in connection with your use of its our websites and services (including mobile applications and IoT integration), who we usually disclose your personal information to, and your privacy rights.

This Privacy Policy does not apply to any other sites or applications to which users of our services can link and we are not responsible for their privacy practices.

Rollesee Acmeda is a data controller for our website and services.

#### Updates to this Privacy Policy

We may update this Privacy Policy from time to time if our practices, technology or legal requirements change. The latest version of this Privacy Policy will appear on Rollesee Acmeda's website, mobile apps and IoT Integrations at [www.rolleseeacmeda.com](http://www.rolleseeacmeda.com). Your subsequent and ongoing use of our websites and services will be subject to the changes to the Privacy Policy once posted.

### 2. What types of personal information do we collect and hold about you?

Personal information we collect from you when you visit our websites and use or interact with our services may include:

- your personal and/or professional contact details (such as name and job title, address, email address, phone number, mobile phone number);
- your business name and address details;
- your online member log in, details, account details, profile and activities;
- your shade device operating related information such as settings, schedules and timers and information about how you are using our websites, mobile apps, and IoT integrations; and your Pulse Hub information such as SSID, passwords, shade device operating related information such as settings, schedules and timers.

### 3. How do we collect your personal information?

Wherever possible, we will collect your personal information directly from you, such as when you contact us, visit our websites, use our mobile apps or IoT integrations or purchase a product from us, attend one of

our events or apply for a job with us. We may also collect your personal information from other third parties such as legitimate resellers of customer databases.

#### 4. Our use of cookies

A cookie is a small piece of data shared between a web server and a user's browser that the website uses to give the server information about a user's identity and website visiting patterns and preferences. Cookies are standard Internet technologies used by many websites. Most internet browsers are pre-set to accept cookies.

The cookies we use typically enhance our services to you. Some of our services actually need cookies to work, others simply make our services easier for you. In general, we use the following types of cookies:

- essential cookies, which are essential to provide you with the services you have requested. For example, these include the cookies that make it possible for you to login, view the terms and conditions, be redirected to the correct site for your region and scroll back after comment submission. If you set your browser to block these cookies, these functions and services may not work for you; and
- performance cookies, which measure how often you visit our sites and how you used them. We use this information to get a better sense of how our users engage with our websites and mobile applications, so that users have a better experience. For example, we collect information about which of our pages are most frequently visited and by which types of users. We use a Google Analytics cookie which gives us information on website users' journey, behaviour and location. More details about Google's privacy practices in relation to Google Analytics can be found here: <https://support.google.com/analytics/answer/6004245?hl=en>.

If you prefer not to enable cookies, you may be able to adjust your internet browser settings to refuse cookies or to warn you when cookies are being used. Please visit your browser's or device's reference information to learn how to adjust your settings. For example, you may be able to block all cookies, accept only certain types of cookies or delete all cookies upon exiting your browser. However, if you disable cookies, this may affect the functionality of the website for you.

#### 5. Why do we collect and use your personal information?

Rollease Acmeda relies on the following legal grounds to process your personal information:

- **with your consent:** where required, Rollease Acmeda will only use your personal information for the purposes for which you have given your valid or explicit consent, which we will obtain before processing your information. You can withdraw your consent by contacting us using the details set out below;
- **contract performance:** may need to collect and process your personal information in connection with an agreement with you or to perform our obligations under a contract with you in relation to the goods or services we provide, including enabling Automate Pulse 2 to interact with other third party connected devices, such as Google Home;
- **if it is necessary for Rollease Acmeda's legitimate interests** and does not override your rights and interests. This may be when:
  - delivering, improving, personalising and marketing our products and services;
  - allowing you to set up a user account and profile;
  - communicating with and responding to queries, communications or complaints from our customers;
  - delivering and managing communications about our products, services, and events;

- managing our customer accounts and records;
- verifying the identity of individuals who access our services and products;
- protecting and ensuring the security of our businesses, networks and services; and
- for sales, marketing and business administration; and
- to comply with laws or regulations that apply to Rollease Acmeda.

6. Direct marketing

We may use or disclose your personal information to send you marketing communications about our products, services and events via email, social media and post. You can opt out of receiving our direct marketing communications at any time by clicking the Unsubscribe link on our website footer. Also, any direct marketing message we send will also contain a mechanism in the message to enable you to unsubscribe from further direct marketing.

7. What happens if you don't provide your information to us?

If you do not provide your information to us, we may not be able to:

- provide you with the product or service you want;
- respond to your requests;
- manage or administer your product or service;
- personalise your experience with us; or
- let you know about other products or services that might better meet your needs.

8. Who do we disclose your personal information to, including overseas?

Rollease Acmeda may disclose your personal information to:

- our third party service providers, including e-vendors, our agents and contractors who provide financial, legal, administrative, email and marketing or other services in connection with the operation of Rollease Acmeda's business;
- if you use a Google Home device, the Automate Pulse 2 hub will automatically share with Google information gathered by the hub about your use of the products, such as your name, shade positions, room names and scenes. Google will treat this information in accordance with its own Privacy Policy;
- Rollease Acmeda affiliates and related entities;
- purchasers, in the event we sell all or a portion of our business or assets, such as in connection with a corporate acquisition or bankruptcy; and
- others, when required to comply with applicable law or request from a regulator or for cooperation with the government, to prevent or reduce fraud or verify or enforce compliance with the terms governing our services, or to protect our or our users' or employees' rights, property, and safety.

Rollease Acmeda is an international business and has entities located in various countries, including Australia, the United States of America and countries within the European Union. Certain aspects of our business activities may require the transfer of your personal information from one country to another. Depending on where you live, your personal information may be shared with the Rollease Acmeda group of companies that are based in Australia, the USA or the EU. Your personal information may also be stored on Rollease Acmeda information servers located in Australia, Italy and the USA as well as cloud-based servers operated by our cloud service providers.

If we, or our service providers, transfer any of your personal information we collect from you out of the EEA, it will only be done with relevant protections in place. We will take steps to ensure that your personal information will be afforded the level of protection required of us under, and in accordance with, applicable data protection laws and in accordance with current legally recognised data transfer mechanisms, such as where the country has been deemed adequate by the European Commission, where a valid Privacy Shield certification exists (in the case of a data transfer to a Privacy Shield certified US recipient) or by adopting appropriate European Commission approved standard contractual clauses.

#### 9. How do we hold and keep your personal information secure?

Rollease Acmeda holds your personal information on electronic files on its databases and servers. We may combine personal information we receive about you with other information we hold about you. This includes information received from third parties.

Rollease Acmeda takes appropriate steps to ensure that the personal information we hold is kept secure and protected from unauthorised access, loss or disclosure through various methods. These include password and authorisation protection and secure storage. Also, data encryption protocols are implemented in relation to our cloud service provider which hosts our mobile app and IoT integrations.

Please contact Rollease Acmeda immediately if you believe that the personal information that we hold about you may have been compromised so that we can investigate the matter.

#### 10. What happens when we no longer need your information?

We will only keep your information for as long as we require it for our purposes. We're required to keep some of your information for certain periods of time under law. When we no longer require your information, we will destroy or de-identify it.

We may need to retain certain personal information after we cease providing you with products or services to enforce our terms, for fraud prevention, to identify, issue or resolve legal claims and for proper record keeping.

We may also retain a record of any stated objection by you to receiving marketing for the purpose of ensuring we can continue to respect your wishes and not contact you further.

#### 11. Your rights

##### *How to access your information*

Subject to applicable laws, you may request access to your personal information. We will need to verify your identity before we can give you access. We will acknowledge receipt of your request, and we will endeavour to deal with and respond to your request within a reasonable time.

In certain circumstances, we are permitted by law to refuse access to your personal information. In such cases, we will give you a written explanation for our decision (including, where applicable, an alternative means of access to the information, such as supervised inspection), and how you can complain if you are not satisfied with our decision.

You will not be charged for making a request for your personal information. However, we may charge a fee to provide your information to cover administrative costs (including for supervised inspection). We will inform you of any fee at the time your request is made.

We will give you access to your information in the form you want it where it's reasonable and practical (for example we can give you a disk recording of a phone call you had with us).

If you would like to request access to your personal information, contact us using the details in section 13 below.

#### *How to correct your personal information*

If you think that any personal information we hold about you is inaccurate, you may ask us to correct it. We will take reasonable steps to correct it unless we disagree with your reasons. If we refuse to correct your personal information we will give you a written explanation why.

If you would like to request correction of your personal information, contact us using the details in section 13 below. You can also update your profile and account details on our website at any time, by selecting the "my account" function and then "edit/change details" here <http://www.rolleseeacmeda.com/user-profile>.

#### *Additional rights and choices*

In certain circumstances, you can:

- obtain information about the processing of your personal information;
- ask us to erase your personal information, such as if you withdraw your consent and we are not otherwise legally entitled to retain it;
- object to, and ask us to restrict, our processing of your personal information, although we may continue to process your personal information while we verify your assertion your information is inaccurate or if we are processing your information for our legitimate interests;
- receive some personal information you have given us in a structured, commonly used and machine-readable format or ask us to transmit it to someone else if technically possible feasible; and
- withdraw your consent (but we may be able to continue processing without your consent if there is another legitimate reason to do so). The withdrawal of your consent will not affect the processing of your information to which you had consented.

#### 12. How do you make a privacy complaint?

If you believe that Rollesee Acmeda has handled your personal information inconsistently with this Privacy Policy or its privacy obligations, you can make a complaint using the relevant contact details below. To address your complaint, we may need to verify your identity and ask you to provide us with further information to enable us to investigate your complaint.

We will investigate your complaint and notify you of our decision and offer any resolution that we consider appropriate within a reasonable period of time.

If you are not satisfied with our resolution of your complaint, you can contact your local data protection supervisory authority.

#### 13. Rollesee Acmeda contact details

If you have any questions or comments about this privacy policy or wish to exercise any of your privacy rights, please contact:

Name: EU Customer Service Department

Email: [custsvc@rolleaseacmeda.com](mailto:custsvc@rolleaseacmeda.com)

You should raise your complaint with the relevant supervisory authority in your country. Further information can be found online, at the website of the European Data Protection Supervisor, at [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en).