

Privacy Policy

In this Privacy Policy (Hereinafter referred to as "Policy"), SUMEC Machinery & Electric Co., Ltd. (Hereinafter referred to as "we", "our" or "SUMEC") and our subsidiaries, provide information about how we collect, use, store & process and transfer personal data. For this Policy, we use the term "personal data" broadly to cover the many privacy and data protection laws applicable to us. "Personal data" means any information relating to an identified or identifiable individual; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physiological, genetic, mental, economic, cultural or social identity of that natural person."

Scope

This Policy applies to Esperta Casa and covers only data collected through the Esperta Casa and not any other data collection or processing, including, without limitation, data collection practices of other services that maintain their own, separate privacy policies.

What personal data is collected by Esperta Casa?

- **Information you provide during setup**
When you install Esperta Casa, you will be asked to provide personal information such as Email Address or Phone Number and optionally, other data like Full Name and Photo.
- **Usage information**
We collect data about activities you perform in Esperta Casa, like changing any setting of the controlled devices.
- **Performance information from controlled devices**
We collect information like the configuration and state published by the controlled devices.
- **Technical information from your Smart Phone**
To improve your experience over time and help troubleshoot any problem you may encounter with Esperta Casa, we collect Phone make & model and OS version.

Purpose for collection

- Provide functionality to control devices
- Customize your experience
- Troubleshoot and improve our service
- Provide secure access to your own devices only by your email address
- Enhance business opportunities

Lawful basis for processing personal data

We process your personal data for the purposes described in this Policy, based on the following legal grounds:

- **Your consent**
With your consent or at your request, we collect and store your personal information within the scope of your consent/request. You can withdraw such consent at any time by contacting us.
- **Legitimate Interest**

We process your information for our legitimate interests such as providing support for the products you use, operating our business, meeting our contractual obligations, and protect the security of our systems and our customers.

- **Compliance with legal obligation**

We process your data when we have a legal obligation to do so, for example, if we are responding to a legal process or an enforceable governmental request.

Cookies

Cookies are small text files that are stored on your computer or smart phone when you visit certain websites or mobile application.

Cookies may be used for many different purposes. For example, cookies can be used to show that you have visited our website before and to identify which parts of the site you might be most interested in. Cookies can also improve your experience by storing your preferences and usage information when you use our product and service.

Where We Store and Process Data

We store and process all the relevant information in Amazon Web Services (AWS) servers in Brazil (sa-east-1 region) only after explicit consent from individual who personal data is stored and processed.

Data Retention

The data is retained as long as you are an active user on our system. We will notify you after the login is identified as dormant for “one year” and will delete the login and associate data after “ninety days” of notification.

Data related to Minors

If you are under 18 years old or you are a minor pursuant to the laws and regulations of the place in which you reside, we recommend you to ask your parents or guardians to read this Policy and use our services or provide your information to us with the prior consent from your parents or guardians. If your guardians do not allow you to use our services or provide your information to us according to this Policy, please stop using our services immediately and give a notice on time so that we can react accordingly. SUMEC do not knowingly collect or store any personal information from anyone under 18 years old. SUMEC will keep personal information of minors confidential and safe in accordance with the relevant laws and regulations.

Privacy Principles

The SUMEC complies with the Privacy requirements as set forth by the Brazil’s data protection regulation regarding the collection, use, and retention of Personal Information transferred from the Brazil to a third country. The organization adheres to the privacy principles relating to the processing of personal data.

- **Lawfulness, fairness and transparency:** The personal we collected from you is processed as per the purpose know to you while taking consent and to meet our contractual obligations.

- **Purpose Limitation:** We process your personal information for legitimate purposes, we will further notify you if the original purpose is changed.
- **Data minimization:** When we receive the personal information directly from you or through our clients, we ensure its adequate, relevant and meets the purpose for which it is collected.
- **Accuracy:** We have implemented robust product to ensure the information we hold is accurate, we can contact us if you find that your personal information is inaccurate. We will respond to you within 10 days.
- **Storage limitation:** We keep personal information no longer that necessary for the purpose and to meet our contractual obligations. We use technique like pseudonymization or anonymization so that information is not identifiable to an individual.
- **Integrity and confidentiality:** We ensure your data remains secure and confidential, including certain processing carried out by sub-processor. For this purpose, the appropriate technical and organizational measures are in place to prevent the loss, misuse, alteration and deletion of your personal data. These measures are adapted according to the level of sensitivity of this processed data and the level of risk that the processing or implementation of it presents.

Individual rights

We have defined a procedure for you to seamlessly exercise the rights you have to manage your personal information collected by us. We act as a controller for the personal data collected through Esperta Casa. You can exercise below rights by contacting us (iot@sumec.com.cn)

- Request access to the personal data we process about you. This right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- Request a rectification of your personal data. This right entitles you to have your personal data be corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data. This right entitles you to request that we no longer process your personal data.
- Request the erasure of your personal data. This right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes. You can delete your account using the phone apps for this.
- Request the restriction of the processing of your personal data This right entitles you to request that we only process your personal data in limited circumstances, including with your consent.
- Request portability of your personal data This right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to us.
- Withdraw of Consent. To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting us. We will process your request within a reasonable time from when the request was made, and thereafter not collect, use and/or disclose your personal data as per your request.
- Complaint. You can also complain to the authority if you are unhappy with how we have used your data.

Integration with external components and links to other websites

As part of our application functionality, we have integrated third-party plug-ins or components in our mobile application to provide you the smooth sign-in option. However, we are not responsible for the privacy practices employed, including their intent or behavior by those external sources or websites. This Policy applies solely to the information collected by us through our Site. Therefore, this Privacy Policy does not apply to your use of a third-party plug-ins or components or website accessed by selecting a link on our Site or via our Site. To the extent that you access or use the Service through or on another website or application (including Alexa, Google Voice Assistant, etc.), then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

Modification of the personal data protection notice

This Privacy Notice is subject to change. This policy is provided to facilitate the rights of natural persons with regard to the processing of personal data under Law No. 13,853/2019 (Brazilian Data Protection Law), also known as the LGPD. We hope that the above content concerning services and this web site are as concise, transparent, and intelligible as possible.

Privacy Contact

If you need to get in touch about accessing your data stored on our servers, or for any another complaint or query, please reach out to us at iot@sumec.com.cn.