



SKYPEL privacy policy

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SISTEMAS DOMÓTICOS SA DE CV hereinafter SKY PEL ("we", "our" or "SKY PEL"), and its affiliates and subsidiaries, are committed to protecting your privacy and exercising your "ARCO" rights. SKY PEL's privacy policy (this "Policy") describes our practices regarding the privacy of information about Personal Data (as defined below) that we process through the use of our products and services (collectively, the "Services"), for example, the SKY PEL Mobile Application. (the application").

Before you start using the Services, please read this Policy carefully which details our purposes for collecting and processing your Personal Data, as well as how we use, store, share and transfer your Personal Data. In this Policy you will also find ways to exercise your rights to access, update, delete or protect your Personal Data.

If you have any questions regarding this Policy, please feel free to contact us via:

Customer service department:
admo@grupostriva.com

You are not required to provide us with your Personal Data (as defined below). However, we may not be able to provide you with certain products and/or Services if you refuse to provide such data.

Definitions

In this Policy:

Affiliate: means any company, firm or legal entity that: (1) is directly or indirectly controlled by SKY PEL; or (2) directly or indirectly controls SKY PEL; or (3) jointly with SKY PEL, controls the same company; or (4) is, directly or indirectly, under common control of the same company with SKY PEL. Affiliates shall include, but are not limited to, SKY PEL's parent companies, subsidiaries and those subsidiaries under common control with the same parent company as SKY PEL.

Personal Data: means information generated, collected, recorded and/or stored, electronically or otherwise, that can be used to identify an individual or reflect an individual's activity, either from that information alone or from that information and other information to which we have access. about that individual.

Personal sensitive data: includes personal biometric information, communication records and contents, health information, transaction information, and precise location information, etc. in accordance with various data protection laws and

regulations. When we collect Sensitive Personal Data from you, we will generate an explicit notice for your consent prior to collecting Sensitive Personal Data about you.

Smart Devices: Refers to those computing devices produced or manufactured by hardware manufacturers, with a human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, smart wearable devices, smart wearables, air cleaning etc

What personal data do we collect?

In order to provide our services, we ask the user to provide the personal data necessary to provide these services, such as; Full name, address, phone number, etc. If we do not receive your personal data, it is impossible to provide you with our products or services.

1. Information you voluntarily provide to us

-Registered Account Data: When you register an account with us, we may collect your account name and contact details, such as your email address, phone number, username and login credentials. During your interaction with the Services, we may collect your nickname, country code, language preference, or time zone information in your account.

If you authorize the login to the Services with a third party account, we will obtain from the third party your account information (such as picture, nickname, region, etc.) that can be linked with your SKY PEL account for a login Quick. We will ensure compliance with applicable data protection laws and regulations, as well as agreements, policies or documents agreed to with such third party in relation to the sharing of personal information, in the processing of your Personal Data.

-Feedback: When you use the feedback and suggestion features on the Services, we will collect your email address, mobile phone number, and the content of your feedback to address your issues and resolve device failures in a timely manner.

Information based on additional features:

In order to offer you more convenient and higher quality Services with enhanced user experiences, we may collect and use certain information if you agree to use additional features in the Application. Please note that if you do not provide such information, you may continue to use the basic services of the Application and connected smart devices, but certain features based on these additional features may not be available. These additional features may include:

Additional functions based on location information:

When you enable location-based features through permission settings on your mobile device, we will collect and process your location information to enable these features, such as pairing with your smart devices. In addition, we may collect information about your

- a) precise and real-time location, for example when you choose to use the automation scenarios to control your smart device or
- b) geographic location is not accurate when using certain smart devices or the Services, such as robot cleaner and weather service.

Based on your consent, when you enable the geo-fencing feature, your location information will be generated and shared with Google Maps services. Please note that Google has corresponding data protection measures, which you can refer to Google's Data Protection Terms for more details. You can opt out of the collection and use of your location information by managing device-level settings, after which we will stop collecting and using your location information.

You can choose not to use location information: "My - Settings - Privacy rights settings - Turn location information on/off"

Additional camera-based services:

You can use the camera to scan the code by turning on the camera permission to pair with a smart device, take videos, etc. Please note that even if you have agreed to enable the camera permission, we will only collect information when you actively use the camera to scan codes, record videos, etc.

You can choose not to use the camera permission: "My - Settings - Privacy rights settings - Turn camera on/off"

Additional services for accessing and uploading images/videos based on photo albums (image library/video library):

You can use this function to upload your photos/images/videos after activating the photo album permission, to perform functions such as changing the avatar, reporting device usage problems by providing photographic evidence, etc. When you use photos and other features, we will not recognize this information; but when you report a device usage problem, we may use the photos/images you upload to track down your problem.

You can choose not to use the photo album permission: "My - Settings - Privacy rights settings - Turn photo album on/off"

Additional services related to the microphone-based service:

You can use the microphone to send voice information after enabling the microphone permission, such as recording videos, activating voice assistant, etc. For these features, we will collect your voice information to recognize your command. Please note that even if you have agreed to enable microphone permission, we will only get voice information through the microphone when you voluntarily enable the microphone in the app.

You can choose not to use the microphone permission: "My - Settings - Privacy rights settings - Turn microphone on/off"

Additional services based on storage permission (Android):

The purpose is to ensure the stable operation of the application using the storage permission. After you give or indicate permission to read/write to your mobile device storage, we will access images, files, crash log information, and other necessary information from your mobile device storage to provide you with features, such as posting information, or log the fault. record information locally.

You can choose not to use storage permission: "My - Settings - Privacy rights settings - Turn storage on/off"

Additional services based on Notification permission:

The reason we ask your permission is to send you notifications about the use of the products or services, especially if you have purchased security services and require an alert or message so that you can capture the status in real time.

You can choose not to use app notifications: "My - Message center - Settings - Turn notifications on/off"

Additional services based on the alert window permission:

If you choose to link a camera in the app and require the app to display the live image from the camera in a separate window.

You can choose not to use the browsing information: "My - Settings - Privacy rights settings - Enable/disable alert window".

Additional services based on Bluetooth permission:

You can enable Bluetooth functions after enabling permission, including smart device control, device status acquisition, device discovery, and device network

configuration. In these functions we will communicate with the terminal devices through Bluetooth. Please note that even if you have agreed to enable Bluetooth permission, we will only use Bluetooth for communication in these scenarios: display device status on the home page and smart device dashboard; perform device control on the home page and device panel; we would use it on home page and add device page to discover equipment, equipment distribution networks.

You can choose not to use Bluetooth through "My - Settings - Privacy Settings - Disable/Enable Bluetooth Permission".

Additional HomeKit permission-based services (iOS):

You can enable related features after enabling HomeKit permissions, including discovering smart devices, enabling smart device network settings, controlling smart devices, and checking device status. Among these functions, we will process data with the "Home" app that comes with the iOS system through HomeKit. Please note that even if you have agreed to enable the HomeKit permission, we will only use it in these scenarios: on the home page, to discover HomeKit devices, HomeKit device network settings; in "Settings - HomeKit" to discover HomeKit devices, HomeKit device network settings.

You can opt out of using HomeKit permission via "My - Settings - Privacy Settings - Turn HomeKit permission on/off".

Additional services based on HealthKit (iOS):

You can proactively enable related features after enabling HealthKit permission, including weight, height, running, and swimming statistics. In these functions, we will exchange data with the health-related functionalities that come with the iOS system through HealthKit. Please note that even if you have agreed to enable the HealthKit permission, we will only use them in these scenarios: When you use the smart device related to health, such as body fat scales, bracelets, watch and consent to use HealthKit, the data reported by the smart device will be transferred to HealthKit.

You can opt out of using HealthKit permission via "My - Settings - Privacy Settings - Turn HealthKit permission on/off".

Please note that if you activate any permission, you authorize us to collect and use relevant personal information to provide you with the corresponding Services. Once you deactivate any permission, we will take it as a cancellation of the authorization, and we will no longer continue to collect Personal Data based on the corresponding permissions, and the related functions may be canceled. However, your decision to



disable permission will not affect prior collection and use of information based on your permission.

2. Information we collect automatically

-Mobile Device Information: When you interact with our Services, to provide and maintain the common operation of our Services, to improve and optimize our Service, and also to protect the security of your account, we automatically collect mobile device information, such as the device model mobile. number, IP address, wireless connection information, operating system type and version, application version number, push notification identifier, log files, and mobile network information. In the meantime, we will collect the version number of your software. To ensure the security of the operating environment or to provide services, we will collect information about installed mobile applications and other software you use.

-Usage Data: During your interaction with our websites and Services, we automatically collect usage data related to visits, clicks, downloads, messages sent/received, and other use of our websites and Services.

-Log information: When you use the app, in order to improve your user experience, the system and exception log may be uploaded, including your IP address, preferred language settings, operating system version, date or time so that we can facilitate and accurately identify problems and help you resolve them in a timely manner.

Please note that a specific person cannot be identified using device information or registration information alone. However, if these types of non-personal information, combined with other information, can be used to identify a specific person, such information will be treated as Personal Data. Unless we have obtained your consent or data protection laws and regulations provide otherwise, we will aggregate or desensitize such information.

3. Information related to Smart Devices:

When you use a smart device, we will collect basic and pre-integrated information from the smart device and information generated during your use of the smart device.

-Basic Smart Device Information: When you connect your smart devices to the Services, we may collect basic information about your smart devices, such as device name, device ID, connection status, activation time, firmware version and update information.

-Information collected during the process of connecting to a smart device: Depending on the type of smart device you need to connect, the basic information collected includes:

- Smart devices connected via Wi-Fi: Wi-Fi information (SSID, Wi-Fi password), Mac address of the device;

- After establishing a local connection via Bluetooth, smart devices connected via Wi-Fi: Wi-Fi information (SSID, Wi-Fi password), device Mac address;

- Smart devices connected via Bluetooth: Mac address of the device;

- Smart devices connected via Zig-bee: Mac address of the device.

-Information Reported by Smart Devices: Depending on the different smart devices you choose to connect with the Services, we may collect different information reported by your smart devices. The following information reported by the smart device only applies when you use them:

When you voluntarily use a smart camera (IPC service) and connect to SKY PEL platform: When you connect a doorbell camera, door lock or smart surveillance camera through SKY PEL service to monitor the security of your residence, During the process, the device can capture the images if it recognizes that someone or an object is moving, and then provide you with a playback of related surveillance content. At this time, we will automatically encrypt the captured image and save it locally on the device.

The cloud storage service available for video streaming devices is a service provided by a third-party service provider, and data handling will be handled by the same provider, adhering to the following guidelines:

When you actively choose and successfully purchase the cloud storage service, the smart camera will upload the pictures or video files you have taken to the cloud for further storage, so that you can review them on the app. The provider will keep your information depending on the cloud storage service you purchase. When you choose to delete the image in advance in the SKY PEL app, you can delete the image in the message center and if you need to delete a video in the app, the cloud will act immediately to delete the video files stored in the SKY PEL app. cloud.

2. Purposes and legal basis for the processing of personal data

The purposes for which we may process information about you are as follows:

-Provide you with services: We process your account data, mobile device information, usage data, location information, and smart device-related information to provide you with the Services and the Services you have requested. The legal



basis for this processing is to perform our contract with you in accordance with our User Agreement.

-Improving our services: We process your mobile device information, usage data, location information and smart device-related information to ensure the functions and security of the Services, develop and improve the Services, analyze the efficiency of our operations and prevent and track fraudulent or inappropriate use. The legal basis for this processing is to perform our contract with you in accordance with our User Agreement.

-Non-commercial communication: We process your Personal Data to send you important information about the Services, changes to our terms, conditions, and policies, and/or other administrative information. At the same time, we will also send you notifications related to the services you have purchased, such as alert services. You can check the "App notification" in the app ("Me > Message center > Settings > Notification settings") to manage these communications. When you choose not to enable the Notifications feature, we will no longer process your information for that purpose. The legal basis for this processing is to perform our contract with you in accordance with our User Agreement.

-Data analysis: to analyze the use of the products we provide and improve your user experience, we will analyze the data you provide us,
a) we need to check your problems when you encounter any malfunctions during the use of the product, under such circumstance, you may not be able to opt out because it is closely related to its functionalities and the quality of the use of our product and service, and
b) analyze data about how you interact with the product or in particular scenarios so that you can better enjoy the convenience provided by our Services, under such circumstance, if you do not agree to data analysis of your data, you can enter the privacy settings of the SKY PEL application ("My> Settings> Privacy settings> Data analysis") to deselect it. The legal basis for such processing is based on your consent.

-Marketing communication and personalization: we may process your account data, usage data, device information to personalize product design and provide personalized services for you, such as recommending and displaying information and advertisements about products suitable for you, and to invite you to participate in surveys related to your use of the Services. If you do not allow us to process your Personal Data for personalization, you may opt out when you enter the Application, or by changing your preferences in "Privacy Settings" ("Me > Settings > Privacy Settings > Personalization") in the Application. The legal basis for this processing is your consent.

- Legal accomplice. We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- To comply with a legal obligation, process or request;
- Enforce our Terms of Use and other agreements, policies and standards, including investigation of any potential violations thereof;
- Protect the rights, property, or safety of us, our users, a third party, or the public as required or permitted by law; either
- Detect, prevent or address security, fraud or technical problems.

If there are any changes in the purposes for processing your Personal Data, we will notify you of such change with a prominent notice on our website about such changes in purposes and the choices you may have regarding your Personal Data.

3. With whom do we share personal data?

At SKY PEL, we only share Personal Data in the way we let you know. Without your consent, we will not disclose your Personal Data to third-party companies, organizations, or individuals, except as follows:

To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support, services email delivery and the like. services to enable them to provide services to us.

To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices and/or networks and systems through which you access and use our websites and Services.

To subsidiaries or affiliates within our corporate family for regular business purposes at our direction and in accordance with applicable law, this Privacy Policy, and other appropriate confidentiality and security measures.

To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any part of our business, assets, or stock (including, without limitation, in connection with any bankruptcy or similar proceedings). In such event, you will be notified by email and/or a prominent notice on our website of any change in ownership and the choices you may have regarding your Personal Data.

Because we believe in good faith that access, use, preservation, or disclosure of the information is reasonably necessary or appropriate to:

- (a) Comply with any applicable law, regulation, legal process, or legal government request;
- (b) Enforce our Terms of Use and other agreements, policies and standards, including investigation of any potential violations thereof;

(c) Protect our operation and business systems;

(d) Protect the rights, property, or safety of us, our users, a third party, or the public as required or permitted by law;

(e) Carry out risk management, detection and control of illicit, fraudulent, deceptive or malicious activities.

Except for the third parties listed above, we only disclose your Personal Data to other third parties with your consent.

Data transfer

SKY PEL has international partners and providers and Personal Data may be transferred, stored and processed outside of the country or region where it was initially collected. In addition, the applicable laws in the countries and regions in which we operate may differ from the applicable laws in your country of residence. Under the framework of Personal Data protection and to facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live.

We protect Personal Data in accordance with this Privacy Policy wherever it is processed and we take appropriate contractual or other measures to protect it under applicable laws.

If you would like further details about the security measures we have in place regarding data transfer, you may contact us directly as described in this Privacy Policy.

Rights of data subjects

We respect your rights and control over your Personal Data. You may exercise any of the following rights:

-Through "Me > Settings > Account and security" or through "Me > FAQs and feedback" in the Services (for version 3.2 and later of the Product).

-Sending us an email to admo@gruposkypel.com

You do not have to pay a fee to enforce your personal rights. Subject to applicable data protection laws in the relevant jurisdictions, your personal rights request will be fulfilled within 15 business days or within 30 calendar days due to a different response requirement.

If you choose to email us, in your request, please make clear what information you would like to change, whether you want your Personal Data removed from our database, or otherwise let us know what limitations you would like to put on our use of your Data. Personal. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

The user can:

- Request access to the Personal Data we process about you: "My-Settings-Privacy Settings-Export Personal Data";
- Request that we correct inaccurate or incomplete Personal Data about you: 1) Modify your account number (email address or phone number): "My-Settings-Account and security-Change your account"; 2) Modify the nickname and/or time zone: "My-Personal Information";
- Request the deletion of your Personal Data: "My-Settings-Account and Security-Delete account", when you confirm the deletion of your account, your Personal Data will be deleted accordingly.
- Request restrictions, temporary or permanent, on our processing of some or all Personal Data about you: submit your request through "My-FAQ&Feedback", or send the request by email to admo@gruposkypel.com;
- Request the transfer of personal data to you or to a third party where we process the data based on your consent or a contract with you, and where our processing is automated: Submit your request through "My FAQs and Feedback" or send it by email request to admo@gruposkypel.com;
- Opt out or object to our use of Personal Data about you when our use is based on your consent or our legitimate interests.

Withdrawal of consent:

We will exercise your privacy right to withdraw consent through the following approaches:

- 1) For privacy permissions acquired through device system settings, your consent can be withdrawn by changing device permissions, including location, camera, photo album (picture library/video library), microphone, Bluetooth settings, notification settings, and other related features;
- 2) You can opt out of receiving non-marketing communications through "Me > Message Center > Notification Settings" to manage your selection;

3) You can opt out of data analysis features through "Me > Settings > Privacy Settings";

4) You can cancel the customization function through "Me > Settings > Privacy Settings > Personalization";

5) Unpair the smart device through the app, and the information related to the smart device will not be collected;

6) By using the product in Try Now mode and not enabling the particular location setting for a particular smart scene, we will not collect any personal data about you.

When you withdraw your consent or authorization, we may not be able to continue to provide you with certain applicable products or services. However, your withdrawal of your consent or authorization will not affect the processing of personal information based on your consent before the withdrawal.

About account deletion:

You can find the Delete function through "Me > Settings > Account and security > Delete account" ("Deactivate account" for app version in 3.16.5).

If you would like more information about the protection we apply, you can contact us directly as described in this Privacy Policy.

Your rights in relation to your personal data

We respect your rights and control over your personal data. You can exercise any of the following rights, known as ARCO rights:

You can exercise the "ARCO" rights of Access, Rectification, Cancellation and Opposition regarding your personal data. The exercise of these rights will begin by submitting a written request to the SKY PEL Communications Department . The request must be submitted in duplicate, by you or your legal representative, in a free document.

The request must contain: i) your full name and address or other means to communicate the answer, ii) documents that prove your identity or that of your legal representative, iii) the clear and precise description of the personal data

regarding what seeks to exercise its rights "ARCO", iv) any other element that facilitates the location of the client's personal data.

The Communication Department of SKY PEL will notify the undersigned client within a maximum term of 20 (twenty) business days, counted from the date on which said Department received the request for access, rectification, cancellation or opposition, the determination adopted to effect that it becomes effective within the following 15 (fifteen) business days. These terms may be extended for an equal period when the circumstances of the case justify it. The right of Access comes when you want to know which of your personal data is in the possession of SKYPEL and the Privacy Notice that is applicable to you.

Requests to exercise the “ARCO” rights will be fulfilled in the following terms:

Access: You, or your legal representative, after proof of your identity, may access the documents containing your personal data, either through photocopies, electronic documents or any other means determined by SKY PEL . The delivery of the data will be free as long as the request for access is not repeated in a period of less than twelve months, in which case you will only cover the costs of reproduction in copies or other formats.

Rectification: You may rectify your personal data when they are inaccurate or incomplete, indicating in the rectification request the modifications that must be made and providing SKY PEL with the documentation that supports your request. If your request is appropriate, SKY PEL must inform those third parties in charge of processing said information of the changes in question, if it has been transferred, in terms of this Privacy Notice.

Cancellation: You have the power to demand the deletion of some or all of your personal data, this will lead to a blocking period, in which the data may not be processed and the data will be deleted. The cancellation of personal data will not proceed in the cases provided for in article 26 of the Law.

Opposition: You will have the right at any time and for legitimate reasons to oppose the processing of your data. If the request is valid, SKY PEL will not be able to process the data of the undersigned client.

SKY PEL may deny access to personal data, make the rectification, cancellation or grant the opposition when the applicant is not the owner of the data or his legal representative is not duly accredited for it, in the same way when in its database your personal data is not found, when the rights of a third party are injured, when there is a legal impediment or a resolution of a competent authority that restricts access to personal data or does not allow its rectification, cancellation or opposition and when the rectification, cancellation or opposition has been previously made.

Likewise, you, as the owner of your personal data, may revoke your consent at any time regarding the processing of your data referred to in this Privacy Notice. The exercise of this power will begin by submitting a written request to the SKY PEL



Communications Department . The request must be submitted in duplicate, by you or your legal representative, in a free document or in the formats made available by SKY PEL 's Personal Data Department for this purpose.

The request must contain: i) your full name and address or other means to communicate the answer, ii) documents that prove your identity or that of your legal representative, iii) the clear and precise description of the reasons why you request to revoke your consent to the processing of your personal data, iv) any other element that facilitates the location of your personal data.

The Communications Department of SKY PEL will notify you within a maximum term of 20 (twenty) business days, counted from the time said Department has received the request for revocation of consent on your part, the decision adopted in order to make it effective. within 15 (fifteen) business days. These terms may be extended for an equal period when the circumstances of the case justify it.

The Department of Personal Data of SKY PEL will process the requests of the owner of the personal data regarding the exercise of their "ARCO" rights (access, rectification, cancellation, opposition) and revocation of these, whose attention will be in charge of the Department of Communication from SKYPEL whose office is located at the registered office referred to at the end of this document or via email: atencionalcliente@gruposkypel.com

Security

We use commercially reasonable physical, administrative, and technical safeguards to protect the integrity and security of your personal data. SKY PEL applies various security strategies to effectively ensure the security of user and device data. With regard to data communication, communication that applies security algorithms and transmission encryption protocols, and transmission with commercial quality information encryption based on dynamic keys is used. As far as data processing is concerned, strict filtering and data validation and full data auditing are applied. As far as data storage is concerned, all sensitive user information will be securely encrypted for storage. If you have any reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you may have with us has been compromised), you should immediately notify us of the problem by emailing email atencionalcliente@gruposkypel.com .

Data retention

We process your personal data for the minimum period necessary for the purposes set out in this Privacy Policy, unless there is a specific legal requirement that requires us to keep the data for a longer retention period. We determine the applicable retention period based on the amount, nature, and sensitivity of your personal data, and when the retention period ends, we will delete your personal data. Where we are unable to do so for technical reasons, we will ensure that appropriate measures are in place to prevent any future use of your personal data.



Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes we make to our information practices at least once a year. If we make any material changes, we will notify you by sending you an email notification (to the email address specified in your account) or by means of a notice in the mobile applications prior to the change becoming effective. You are encouraged to periodically review this page for the most up-to-date information on our privacy practices.

Contact us

If you have any questions about our practices or this Privacy Policy, please contact us by email admo@gruposkypel.com

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