

HABI APP

The following document (hereinafter referred to as “Document”) sets out the Privacy Policy specific to Salus Limited. and its affiliates (hereinafter referred to as ”Habi”, ”we”, ”us” or ”our”) products, devices and services (collectively hereinafter referred to as “Products”), that are operated by and/or under the setting of the Habi application (hereinafter “App” or “Application”).

This Document covers users in the European Economic Area (“EEA”) and in the United Kingdom (“UK”) of the following Products operated through the Application:

- Habi IT850
- Habi TRVM
- Any other operated by the Application, provided by us, Products.

Any reference to “you”, “your” or “User” shall mean the user of the operated by the Application Products and includes any individual or commercial users.

You must be at least 18 years of age to register an account on the Application. Our Products and Apps are not intended or directed to persons under the age of 18.

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PRIVACY POLICY OF THE APPLICATION HABI

A. Introduction and Scope

1. This Privacy Policy (hereinafter referred to as "Privacy Policy") sets out how Habi will process your personal data, to allow you to operate or use our Products through our App.
2. Personal data or personal information refers to information in any form that can identify an individual. This includes any data, attributes or activities associated with an identifiable person or can be combined to identify a person. Any personal data you supply to us via our App or Products will be treated in accordance with applicable data protection laws.
3. When you provide us with personal data about others, we presume that you have permission to provide the data, notify the relevant individual(s) before sharing their information and present this Privacy Policy (or your own legally compliant privacy policy), explaining that their personal information will be processed in accordance with the relevant Privacy Policy. By accepting our Privacy Policy, you are confirming you have provided the information requirement to the relevant individual(s) and will comply with all applicable laws relating to the personal data of the relevant third party.
4. Our Products and App are not intended for or directed at persons under 18 years of age. Habi does not knowingly collect, use or disclose personal data from anyone under 18 years of age.
5. You understand that the sharing of personal data by you is voluntary. The provision of personal data by you to Habi will take place upon your acceptance of the Privacy Policy during the installation of the Application, which is done by clicking on the "I agree to the Privacy Policy" option.
6. By accepting the Privacy Policy, you agree to all the provisions contained therein, in particular you consent to the collection, processing and sharing of your personal data by Habi and third parties, including those located outside the European Economic Area and not providing an adequate level of personal data protection, on the terms and conditions consistent with the content of this Privacy Policy.

B. Data Controller and Data Protection Officer

1. For the purposes of the European Union (hereinafter referred to as "EU") General Data Protection Regulation (hereinafter referred to as "GDPR") and the UK's version of GDPR and the Data Protection Act 2018, Habi acts as the data controller responsible for determining the purposes and means of any processing of your personal data.
2. Habi has appointed a Group Data Protection Officer (hereinafter referred to as "DPO") for you to contact if you have any questions or concerns about our personal data policies or practices. The DPO can be contacted via email at: dataprotection@habismarhome.com, or by post at:
Data Protection Officer
Habi Solutions
Units 8-10, Northfield Business Park
Forge Way, Rotherham
South Yorkshire

S601SD
United Kingdom

C. What We Collect and How We Use Your Personal Data

1. Habi will collect and process your information when we have one or more of these reasons:
 - 1) To fulfil an agreement, we have with you (Agreement)
 - 2) When it is our legal duty (Legal)
 - 3) When it is in our legitimate interest (Legitimate Interest).
2. Legitimate Interest means the interest of conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
3. The table below describes the personal data Habi collects from users of our Apps and Products, how we may use such personal data, and the reasons or purposes we rely on to do so.

TYPE OF PERSONAL DATA	REASON / PURPOSE DETAILS
<p><u>Account Registration or Profile Information</u></p> <p>This is the personal data you enter and submit to register details on our App and includes:</p> <ul style="list-style-type: none"> • First and Last Name • Email Address • Password • Address • Postal Code • Telephone Number • Language 	<p><i>Basis for Processing: AGREEMENT</i></p> <p>This information is used to meet our contractual obligations and provide our services to you as described when you purchase our Products, and / or in the Terms and Conditions you accept when you download and use our App.</p> <p>For example, we use this information to:</p> <ul style="list-style-type: none"> • register and link Products to an account or profile. • authenticate a Device owner and manage your account. • provide technical support, customer services, and assist you with the installation, use or configuration of your Products and App. • manage an account and provide services to support the operation of your Products. • administer your Device or App remotely. • provide guidance or fixes for you to implement. • log, diagnose and resolve issues or faults; • deal with complaints and claims, and process refunds or a product replacement. • send you specifications, manuals or installation guides; and • transition you between different versions of Apps and replacement Apps. <p><i>Basis for Processing: LEGITIMATE INTEREST</i> We have a legitimate interest to use this data to:</p>

	<ul style="list-style-type: none"> • support our audits and help meet our service standards, or for training purposes; • send you servicing communications by email - such as important notices, alerts, scheduled maintenance, updates or changes to our services; • send you information on new features or functionality of existing products you may own, and information to help improve the safety, security and way you use our Products and Apps; • provide useful information to you on how to better utilize your heating, ventilation and cooling systems, and enhance the use of connected Products and App you already own; • request feedback about the services we are currently providing to you through a survey for research purposes (although you do not need to respond to them); • investigate any suspected breach of our terms; and • send you communications containing promotional information on Habi products, offers, and services and to make suggestions and recommendations to you about goods or services that may be of interest to you. Our legitimate interest here is Necessary for our legitimate interests to develop our products/services and grow our business. <p>Refer to "Your Communications Choices" below for details on how to update your choices.</p>
<p><u>Habi Device and App Information</u></p> <p>This is the personal data passively, automatically or voluntarily sent to us when you install and use our Products and Apps, and includes:</p> <ul style="list-style-type: none"> • IP Address • Device location (if Geolocation is activated and enabled through your smart Device or phone, or if an App or Device uses the location in the background, i.e. uses the location also when the App is not in use) • Names you give to your locations or Products. • Images you decide to upload where they are of a personal nature. • Distance alerts or geo-fencing set up. 	<p><i>Basis for Processing: AGREEMENT</i></p> <p>This information is used to meet our contractual obligations and provide our services to you as described when you purchase our Products, and / or in the Terms and Conditions you accept when you download and use our Apps.</p> <p>For example, we use this information to:</p> <ul style="list-style-type: none"> • add or remove Products to your account; • enable you to view real-time Device settings, status and monitor energy usage; • enable you to control your Products remotely through the Apps; • enable you to control Products owned by people who have authorized you to control their Products through the Apps; • enables you to set the Products to activate or deactivate automatically according to your recognized location (background location use). • enable us to perform analytics to diagnose and resolve problems which we may detect in your heating system or which you as the user may experience; • enable us to monitor the stability of your Products and connections between Device, controller and Internet; and

<p>We also receive Device and App properties and information that will be treated as personal data when combined with Account or Profile Information for as long as it remains combined:</p> <ul style="list-style-type: none"> • How you use Products in your home: For example, <ul style="list-style-type: none"> ○ user behavior when logging on or using our Products or Apps ○ usage history, including household energy and electricity, patterns and use. ○ Device configuration, settings, and schedules including temperature and if Device is set to holiday mode. ○ Device status - whether active or disabled (on/off). • Device Type, Browser Type, Operating System and Application Version 	<ul style="list-style-type: none"> • monitor compliance with these terms or other applicable terms and conditions. <hr/> <p><i>Basis for Processing: LEGITIMATE INTEREST</i></p> <p>We have a legitimate interest to use this data to:</p> <ul style="list-style-type: none"> • carry out historical or statistical research of aggregated information to gain a broader understanding of the performance and use of our Products and Apps over time; • personalize the content you see, based on the details given by you and /or your activity on the App; • investigate any suspected breach of our terms; • identify, develop and deliver improvements to our products and services for example to assess and enhance safety. Device battery life, stability of Apps, or identify issues with heating system or smart home Device and connections; and • provide useful information on how to better utilize your heating, ventilation and cooling systems, and enhance the use of connected Products and Apps you already own.
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D. What Happens If You Don't Give Us Your Information

1. To fulfil our contractual obligations, we require our users to provide certain categories of personal data as described above. Although failure to provide information will not generally prevent users of Habi products from operating their Products manually, in some cases those users will not benefit from the full user experience and not be able to connect or control our Products remotely through our App. Please refer to the user guide of the Habi branded Product(s) you own for instructions on how to use the relevant Product manually.
2. Our App offer the functionality to switch off "Data Collection" within the App Settings. Please refer to settings within the App you use. Where Data Collection is switched off this means the App will be automatically disabled and your mobile device or computer cannot be used to manage your equipment or service, and you will also not receive important alerts or notifications.

E. Sharing of Personal Data and Locations of Processing

1. Habi will only share personal data with others when we are legally permitted to do so.
2. Personal data may be transferred, stored and accessed outside the countries where we and our data processors are located. This includes countries outside the European Economic Area. The laws in some countries may not provide as much legal protection for your personal data as in the UK / EEA.

3. Habi take steps to ensure all personal data is provided with adequate protection and that transfers of personal data outside the UK (in respect of UK data subjects) and the EEA are done lawfully. Where we transfer personal data outside of the UK and/or EEA to a country not determined by the UK Government or the European Commission as providing an adequate level of protection for personal data, the transfers will be under an appropriate framework that protects the fundamental rights of anyone in the UK or EU for such international data transfers, such as approved standard contractual clauses. If you would like more information on our international data transfer mechanisms, please contact us via the details in section "**Data Controller and Data Protection Officer**".
4. Personal data held by us may be transferred to the following categories of third party (whether as data processor or joint controller):
 - 1) **Affiliates and subsidiaries in the same group of companies as us:** for administration purposes, to fulfil our agreement, deploy our products and services to you, and as necessary to pursue our legitimate interests.
 - 2) **Third party cloud providers:** to provide "Internet of Things" and Internet connection services; provide cloud-based solutions including infrastructure, servers and software; perform diagnostics and support for the stable operating of our Apps and connected Products; provide security, back up and system availability services; and support problem management to resolve issues.
 - 3) **Other service providers, data processors and advisors:** such as companies that support our IT and provide cloud hosting services, help develop and test our Apps, process payments, send communications to our customers, provide us with legal, accountancy, insurance and banking advice, and generally help us deliver our services to you;
 - 4) **Market research partners:** to contact our customers to help us find out how to improve our products and services.
 - 5) **Parties involved in corporate transactions:** as part of a purchase, merger or transfer, or in the event of a bankruptcy.
 - 6) **Parties as a requirement by law:** to comply with the law or respond to compulsory legal process; to assist government or regulators; and to verify or enforce compliance with policies governing our services.

F. Security of Personal Data

1. Habi is committed to keeping personal data secure. We endeavor to apply suitable safeguards including technical, administrative and physical measures designed to protect the privacy and security of your personal data.
2. Habi also minimizes the risk to your rights and freedoms by limiting access to personal data to only those who have a business need and not collecting or storing special categories of information about you through our Apps or Products. We require third party data processors to safeguard personal data and only use your personal data for the purposes we specify.

G. Retention of Personal Data

1. Habi will keep your personal data for as long as is reasonably necessary for the purposes we have described. These periods vary depending on the nature of the information and your interactions with us, our legal basis for processing the information and the

requirements imposed on us by law and regulations. The retention period may also be affected by our litigation, accounting or reporting requirements. When we no longer need (or are obliged) to process your personal data, we will take reasonable steps to securely destroy your information or permanently de-identify it.

H. Your Privacy Rights

1. The GDPR and other countries' privacy laws provide certain rights over your personal data. If you have any questions about how we process your personal data or wish to exercise any of your rights, please contact us via the details in section "**Data Controller and Data Protection Officer**".
2. In certain instances, you have the right to:
 - 1) access, review and/or update your personal data.
 - 2) restrict and/or object to the use of your personal data.
 - 3) withdraw consent for our use of your personal data at any time where we process personal data based on consent, for example to opt-out of receiving marketing messages. This does not affect the lawfulness of the processing that occurred on the basis of your earlier consent, before its withdrawal.
 - 4) request erasure of your personal data, subject to certain conditions, for example where the processing does not comply with applicable data protection laws.
 - 5) when technically feasible, request personal data to be provided or transmitted directly to another controller (right to portability); and
 - 6) request a copy of the personal data we hold about you.
3. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
4. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

I. Your Communications Choices

1. You will receive marketing communications from us if you have requested information from us or you have accepted to receive that marketing. If you wish to stop receiving such communications, you can update your preference at any time by the following methods:
 - 1) Click the "Unsubscribe" link presented in any promotional email communication we send.
 - 2) Updating your notification preferences where available via our Apps; and
 - 3) Contacting us via the details in section "**Data Controller and Data Protection Officer**" and requesting removal from our mailing list.
2. Note - Opting out of promotional emails will not end transmission of important service related emails that are necessary to the on-going use of our services.

J. Complaints

1. Habi hopes that you won't ever need to, but if you do want to complain about our use of personal data, please contact our Data Protection Officer using the contact details in section "**Data Controller and Data Protection Officer**".

K. Changes to This Privacy Policy

1. This Privacy Policy was last updated on 10 January 2025.
2. We recognize that transparency is a continual responsibility, so we will keep this Privacy Policy under regular review and updated.