

PERSONAL DATA POLICY

HOME + CONTROL

Last update: June 2019

This Privacy Policy applies to all Products within the "with NETATMO" ranges of the Legrand, BTicino and Netatmo brands until the deletion of your user account.

IDENTITY OF THE DATA CONTROLLERS

All processing of personal data collected is performed under the responsibility of the Legrand Group: Legrand SNC, Netatmo SAS and Megapower Legrand (M) Sdn Bhd.

DATA COLLECTED AND PURPOSE OF PROCESSING

- Data that you communicate to us

NATURE OF DATA COLLECTED	PURPOSE OF PROCESSING
Surname, first name*	User experience personalisation and identity verification
E-mail address*	Identity verification and contact (password loss, notifications, etc.) Creation of your client file on our CRM Tool Direct marketing activities
Country*	Customer support
Layout of the home (names of modules, rooms, floors, type of equipment, etc.) *	Installation configuration and user experience personalisation

* Mandatory data



Data identified as mandatory are collected on the legal basis of the contract and are essential for providing the Service. Failure to supply mandatory data will prevent us from supplying you with the Service and you from accessing the Solution.

On the basis of our legitimate interest of direct marketing, we may send you communications related to your Solution.

Subject to your express consent, your contact information may be used in order to send you offers, news bulletins, new products and promotional campaigns related to Legrand, Netatmo and BTicino products.

We remind you that you can oppose all direct marketing activities every time you receive our communications and at any time by managing your settings directly from your Home + Control application.

On the basis of our legitimate interest in continuously improving our clients' relations, and unless opposed by you, the personal data you communicated us will be used in order to create your personal client file on our CRM tool.

We will keep all your data for a maximum of 1 month after the deletion of your user account in order to ensure the definitive deletion of all copies and backups made of your personal data for security purposes.

- Data collected on the legal basis of the contract when you use our services

NATURE OF DATA COLLECTED	PURPOSE OF PROCESSING
Geolocation of the home when first installed	Help identifying available WiFi networks and presentation of estimated equipment electricity consumption in applications based on the geographical location
Current and past equipment statuses (on, off, battery level, etc.)	Presentation of equipment status in applications
Current and past equipment electricity consumption	Presentation of estimated equipment electricity consumption in applications
IP address of the Gateway	Customer support on potential connection issues

Such data will also be processed for analysis purposes in order to improve our products and services on the legal basis of the legitimate interest of the Data Controllers.

The user and identification data are kept for the duration of the customer relationship.

Data for connected products is retained until the product is reset at the latest after deleting all accounts associated with the product.

HOSTING OF DATA

We host the data used for the creation and management of your user account on the Eliot Cloud hosted by Microsoft Azure Europe.

Data related to the use of your equipment are hosted by the Legrand Company Netatmo on Microsoft Azure cloud Europe.

HOW THE DATA ARE PROCESSED

The personal data are processed with the help of both manual and computer tools.

ACCESS TO DATA

Only the following have access to your personal data, within the limits of their respective assignments:

- The internal services of LEGRAND, established in France: R&D service in charge of the Solution, Marketing services in charge of direct marketing and client management where applicable and Customer Support, authorized to access the data of your installation for after-sales services purposes should you contact them;
- The internal services of NETATMO, established in France: R&D service in charge of the Solution, Services in charge of the Netatmo Cloud hosting the data produced by your equipment and marketing services in charge of direct marketing and client management where applicable;
- The internal services of Megapower Legrand (M) Sdn Bhd; for the purposes of receiving and answering users' request;
- The service provider Microsoft AZURE, responsible for hosting the Legrand and Netatmo Clouds. We inform you that Microsoft benefits from a "Privacy Shield" certificate and as such, any possible transfer of your data for hosting purposes in the United States will take place under security and privacy conditions which are considered adequate according to European legislation;
- The service provider EXAKIS, established in France, in charge of the maintenance of the Legrand Cloud;
- The service provider CLARANET, established in France, in charge of applications deployments for IT outsourcing purposes;
- The service provider DOTDIGITAL, established in the United-Kingdom, for the purpose of sending you direct marketing communications where applicable. We inform you that we have put the Standard Contractual Clauses of the European Commission in place to organize the transfer of your data towards the UK in order to ensure their security and confidentiality;

- The service provider **MARKETING CLOUD**, for the purpose of sending you direct marketing communications where applicable. We inform you that our partner, Marketing Cloud, has a “Privacy Shield” certificate and as such, any potential transfer of your data for hosting purposes in the United States will take place under security and privacy conditions which are considered adequate according to European legislation;
- The service provider, **SALESFORCE**, developer of our CRM tool. We inform you that Salesforce benefits from a “Privacy Shield” certificate and as such, any potential transfer of your data for hosting purposes in the United States will take place under security and privacy conditions which are considered adequate according to European legislation;
- **GOOGLE** insofar as they have access to data relating to your browsing history when you confirm your agreement upon arrival on our Web App. We inform you that Google benefits from a “Privacy Shield” certificate and as such, any potential transfer of your data for hosting purposes in the United States will take place under security and privacy conditions which are considered adequate according to European legislation. For further information, please consult the section below entitled “Type of cookies”;
- Should you pair our Solution with **BUBENDORFF** shutters, note that the company **BUBENDORFF**, established in France, may access the technical data of your installation in order to provide distant after-sales services in relation with iDiamant Products when you contact them.

We inform you that the aforementioned service providers are bound by an obligation of confidentiality and may only use your data in compliance with our contractual provisions and the applicable legislation.

The disclosure of your Personal Data involves the transfer of your Personal Data to places outside of Malaysia for the purposes that have been communicated to you at the time of collection. By providing us your Personal Data you agree to such a transfer.

THIRD-PARTY PARTNER SERVICES

You may subscribe to services provided by Third-party Partner Service Providers. When you decide to use these Services, you shall grant a delegation for access to data available in the LEGRAND cloud since we do not share your data with Third-Parties (other than the third parties as stated above) without your express consent. Such subscription will be subject to the acceptance of the specific terms of use of the Third-party Partner Service Provider. In this case, the user recognises that LEGRAND does not own and has no control over these Third-party Partner Service Providers and that LEGRAND is not responsible for data processing performed by these Third-party Service Providers. To learn more about the manner in which these Third-party Partner Service Providers process your personal data, we advise you to consult their applicable privacy policies.

DATA SECURITY

In accordance with applicable regulations, LEGRAND has put physical, electronic and administrative protective measures in place to protect your personal data. However, LEGRAND would like to draw the user's attention to the possible risks in terms of confidentiality of data, due to the way the Internet operates. It is the responsibility of users to implement or ensure the presence of means to secure their personal computer network, as well as to ensure proper configuration of the router connected to the Internet service provider and other wireless access methods (e.g.: WIFI, 4G, etc.).

USERS' RIGHTS

You have a right to access, amend or delete personal data pertaining to you.

You can request that their processing be restricted, or you can object to them being processed. When we rely on your consent to perform a particular processing, you can withdraw such consent at any time.

If you request the erasure, or object to the processing of data specified as mandatory and necessary to the supplying of the service, you will no longer be able to access the Solution since operation of the Solution requires the processing of your data.

Should you so request, we may send you the personal data that you have provided to us in an easily accessible format.

In order to exercise one of these rights, you may send your request at any time (see the section "Contact us")

Requests will be handled within one month of receipt. If necessary, this deadline may be extended by up to two months. In such a case, we will inform you of the reasons for this extension.

No payment will be requested for the exercise of your rights, except in the case of a clearly unfounded or excessive request. In such a case, we also reserve the right to refuse to handle your request.

If you are still dissatisfied with our response, you may lodge a complaint with your local Regulatory Authority.

COOKIES AND SIMILAR TECHNOLOGIES

While you are browsing, cookies are placed on your device (computer, mobile phone, tablet), subject to choices that you have expressed and that you may modify at any time by changing your settings (see the section below "Accepting or refusing cookies").

Types of cookies & Third-party services

- Technical cookies required for the proper functioning of the Web Application

Name	Description
x-ms-cpim-cache	Microsoft Azure: cookie related to authentication management Time to live: session
x-ms-cpim-csrf	Microsoft Azure: cookie related to authentication security management Time to live: session
x-ms-cpim-trans	Microsoft Azure: cookie related to authentication management Time to live: session
x-ms-cpim-sso	Microsoft Azure: cookie related to authentication management Time to live: session
homecontrolerliotbylegrandcomaccess_token	Legrand: server access token Time to live: 1h
laravel_session	Legrand: used to create a session ID for the user, the system can identify the user as a unique and individual user, distinct from anyone else viewing the website Time to live: 2h
XSRF-TOKEN	Legrand: used to improve the security of our solution and to prevent repeated intrusions into our Services. Time to live: 2h

These cookies are strictly necessary to the functioning of the Application.

The personal data (unique ID of cookies, session ID) are collected and processed on the contract basis.

- Third-Party Services required for the proper functioning of the Mobile Application

The iOS and Android Home + Control applications use the Crashlytics tool (Google) in order to record crashes that may occur during the use of the application.

Only real-time crash reports are sent with precise indications of code positions and device information; these reports are intended to simplify maintenance and thus improve the stability of the application.

These data are, to us, totally anonymous. To learn more about how Google processes Crashlytics, please visit: <https://docs.fabric.io/android/fabric/data-privacy.html>.

The personal data (unique ID of cookie, IP address, information about the equipment: making, brand and unique ID of equipment, physical location of the device at the time of crash etc.) are collected and processed on the basis of contract. Crash data is kept for up to 90 days.

- Audience measurement cookies on the Web Application

Name	Description
_ga _gat _gid	GOOGLE ANALYTICS: used to record statistics about the internet user's equipment and browsing history (statistics) Time to live: 14 months for _ga, 1minute fpr _gat, 24h for _gid

The categories of personal data collected by these cookies are: unique ID of cookie, IP address, information about the user's equipment and activities performed on the application (first and last visit, length of visit, time of arrival and departure etc.).

These data are, to us, completely anonymous. No nominative data is stored, and no statistical data is cross-referenced with any nominative data that the Legrand Group may have.

When you consent to the deposit of such cookies, this shall constitute the legal basis of the processing. You can reconsider your decision and refuse the statistical analysis of your navigation data at any time by withdrawing your consent. To make this choice, see the section below "Accepting or refusing cookies".

- Third-party services for audience measurement purposes on the Mobile Application

We use Answers (Google) for the collection of statistical data that allows us to know the interactions of the users on our mobile applications and to understand how users use our products and services. To learn more about Google's processing of your personal data through Answers, please visit: <https://docs.fabric.io/apple/fabric/data-privacy.html>.

The categories of personal data collected by Answers are: unique identifier of the cookie, IP address, information on the material and the activities carried out (dates of the first and last visit of the user / duration of the visit / hours of arrival and departure etc.). The retention period of this data is 90 days.

These data are, to us, totally anonymous. No nominative data is stored, and no statistical data is cross-referenced with any nominative data that the Legrand Group may have.

When you consent to the reading of Answers, this shall constitute the legal basis of the processing. You can reconsider your decision and refuse the statistical analysis of your navigation data at any time by withdrawing your consent. To make this choice, see the section below "Accepting or refusing cookies".

Accepting or refusing cookies

When using your web app, you may configure your browser so that cookies are recorded on your device or rejected, either systematically, or according to their issuer, or so that you are informed when a cookie is recorded on your device, in order to enable you to accept or refuse it. However, the deletion of all cookies used may lead to the alteration or loss of certain settings or information and make browsing difficult or even impossible.

Should you give your consent to the reading of data provided by analytics tools on your mobile application, note that you can withdraw such consent at anytime by managing your settings directly within your Home + Control application.



UNDER-EIGHTEEN-YEAR-OLDS

Minors aged under eighteen are not the target user group of the Solution. However, access to the Solution is not confined solely to adults as it contains no content prohibited for persons under the age of 18.

The Solution does not intentionally collect or use personal information relating to persons under the age of 18. If information on a minor is collected by the Solution, his or her legal representative is able to contact the Consumer Affairs Department or the Pro Relations Department at Legrand to have such information rectified, modified or removed (see article on Users' Rights).

CHANGES TO THE PERSONAL DATA POLICY

Should the present document be modified, you will be informed of such modification and will be asked to renew your consent to the terms of this document.

CONTACT US

Megapower Legrand (M) Sdn Bhd,
Lot 1888, Jalan KPB 7,
Kawasan Perindustrian Balakong,
43300 Seri Kembangan,
Selangor, Malaysia
Tel: +60(3) 8962 3333 Fax: +60(3) 8962 2266
www.megapower.net.my | www.legrand.com.my
Email: enquiries@megapower.com.my

The Personal Data Policy Home + Control Notice is to be read together with the Privacy Policy Megapower Legrand Notice and if there is any inconsistency between the Personal Data Policy Home + Control Notice and the Privacy Policy Megapower Legrand Notice, the Personal Data Policy Home + Control Notice / Privacy Policy Megapower Legrand Notice shall prevail only to the extent of the inconsistency