

HUE Power privacy policy

Effective: 20th May 2018

Introduction

Your privacy is important to HUE Power.

We have drafted this Privacy Notice (also referred to as “Notice”) in an easy and comprehensible way in order to help you understand who we are, what personal data we collect about you, why we collect it, and what we do with it. Keep in mind that personal data (in this Notice also referred to as “data” or “your data”) means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc.

Please keep in mind, that HUE Power is an application to control your Philips HUE lighting system. The data policy regarding the underlying hardware produced by Philips is the privacy policy of Philips Lighting which is available here: <https://www2.meethue.com/en-gb/support/privacy-notice>. If you use HUE Power to control any lighting system which is not produced by Philips Lighting, please check the manufacturer’s website for the privacy policy related to the hardware.

We strongly encourage you to take some time to read this Notice in full.

If you do not agree to this privacy notice, please do not provide us with your data.

WHEN DOES THIS PRIVACY NOTICE APPLY?

This Notice covers how we collect and use your data e.g.

- when you visit or use our HUE Power website, HUE Power applications (iOS, Android, Windows Phone) or our social media channels;
- contact us directly;

or otherwise interact with us in your capacity as consumer, business customer, partner, (sub) supplier, contractor or other person with a business relationship with us.

WHO IS HUE Power?

HUE Power is a fast and easy to use remote for Philips hue lights. The applications and the website are developed and owned by Tappointment Kft, a Hungarian limited liability company (address: Királlysor 30, Székesfehérvár, 8000, Hungary).

When this Notice mentions “we,” “us,” or the “Company,” it refers to the controller of your data under this Notice, namely Tappointment Kft with which you had, have or will have a business relationship or that otherwise decides which of your data are collected and how they are used.

WHAT TYPES OF DATA WE COLLECT ABOUT YOU?

Depending on who you are (e.g. customer, consumer, supplier, business partner, etc.) and how you interact with us (e.g. online, offline, over the phone, etc.) we may process different data about you. We may collect your data, for example, when you visit or use our HUE Power website, applications or social media channels, contact us or otherwise interact with us.

Below you will find an overview of the categories of data that we may collect:

Information you provide to us directly:

Categories of data	Examples of types of data
Personal identification data	Name, surname, title,
Contact information data	Email, phone number, address, country
Any other information that you decide to voluntarily share with HUE Power	Feedback, opinions, reviews, comments, uploaded files, interests, information provided at App Store or Play Store

Lastly, if you visit our premises, for security reasons we might also record your data through video or other electronic, digital or wireless surveillance system or device (e.g. CCTV).

Information we collect automatically

When you visit or use our website or applications, or otherwise interact with us through our digital channels, in addition to the information you provide to us directly, we may collect information sent to us by your computer, mobile phone or other access device. For example, the data we may collect:

Categories of data	Examples of types of data
Device information	Hardware model, IMEI number and other unique device identifiers, MAC address, IP address, operating system version, and settings of the device you use to access the services
Log information	Time and duration of your use of our digital channel or product
Location information	Your actual location (derived from your IP address or other location-based technologies), that may be collected when you enable location-based products or features such as through our apps

HOW DO WE USE YOUR DATA?

We may use your data for different legitimate reasons and business purposes.

Below you will find an overview of the purposes for which we may process your data:

Purposes	Examples
Providing support (upon your request)	Providing support via communication channels, such as review and opinion section of the different application stores.
Compliance with legal obligations	Disclosing data to government institutions or supervisory authorities as applicable in all countries in which we operate, such compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, and managing any internal complaints or claims
Defense of legal claims	Establishment, exercise or defense of legal claims to which we are or may be subject

If we ask you to provide us with your data, but you chose not to, in some cases we will not be able to provide you with the full functionality of our products, services, systems or applications. Also, we might not be able to respond to requests you might have.

HOW DO WE USE YOUR DATA FOR MARKETING?

Tappointment Kft. does not use (i.e. send promotional communication in any form, sell or transfer personal information to third parties) any of your data to for marketing purposes.

When required by applicable law, we will ask your consent before starting any kind of marketing activities. In addition, we will give you the opportunity to withdraw your consent (opt-out) at any time.

Please note that even if we do not use your data for marketing activities, you might still receive administrative communications from us, such as technical updates of our products, order confirmations, notifications about your account activities, and other important notices.

ON WHAT LEGAL BASIS DO WE USE YOUR DATA?

In order to be able to process your data, we may rely on different legal bases, including:

- Your consent (only when legally required or permitted). If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time;
- The necessity to establish a contractual relationship with you and to perform our obligations under a contract;
- The necessity for us to comply with legal obligations and to establish, exercise, or defend our self from legal claims;
- The necessity to pursue our legitimate interests, including:
 - o To ensure that our networks and information are secure
 - o To administer and generally conduct business within the Company
 - o To prevent or investigate suspected or actual violations of law, breaches of a business customer contract;
- The necessity to respond to your requests;
- The necessity to protect the vital interests of any person;
- Any other legal basis anyhow permitted by local laws.

WHEN DO WE SHARE YOUR DATA?

We do not share any of your data except in the limited cases described here.

If it is necessary for the fulfillment of the purposes described in this Notice, we may disclose your data to the following entities:

- Service providers: like many businesses, we may outsource certain data processing activities to trusted third party service providers to perform functions and provide services to us, such as ICT service providers, consulting providers, shipping providers. Specifically we use the following service provider's products in our applications:
 - o Business Crashlytics: crash reporting solution in our application. For more information, please visit: <http://try.crashlytics.com/>
 - o Firebase Analytics: is an app measurement solution that provides insight into app usage and user engagement. For more information, please visit: firebase.google.com/official/site
- Public and governmental authorities: when required by law, or as necessary to protect our rights, we may share your data with entities that regulate or have jurisdiction over Tappointment.

WHEN DO WE TRANSFER YOUR DATA ABROAD?

Due to our global nature, data you provide to us may be transferred to or accessed by Tappointment and trusted third parties from many countries around the world. As a result, your data may be processed outside the country where you live, if this is necessary for the fulfillment of the purposes described in this Notice.

If you are located in a country member of the European Economic Area, we may transfer your data to countries located outside of the European Economic Area. Some of these countries are recognized by the European Commission as providing an adequate level of protection. With regard to transfers from the European Economic Area to other countries that are not recognized by the European Commission as providing an adequate level of protection, we have put in place adequate measures to protect your data, such as organizational and legal measures (e.g. binding corporate rules and approved European Commission standard contractual clauses).

HOW LONG DO WE KEEP YOUR DATA?

We keep your data for the period necessary to fulfill the purposes for which it has been collected (for details on these purposes, see above section “How do we use your data?”). Please keep in mind that in certain cases a longer retention period may be required or permitted by law. The criteria used to determine our retention periods include:

- How long is the data needed to provide you with our products or services or to operate our business?
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation.

HOW DO WE SECURE YOUR DATA?

To protect your data, we will take appropriate measures that are consistent with applicable data protection and data security laws and regulations, including requiring our service providers to use appropriate measures to protect the confidentiality and security of your data. Depending on the state of the art, the costs of the implementation and the nature of the data to be protected, we put

in place technical and organizational measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure of, or access to your data.

WHAT ARE YOUR RESPONSIBILITIES?

We would like to remind you that it is your responsibility to ensure, to the best of your knowledge, that the data you provide us with, are accurate, complete and up-to-date. Furthermore, if you share with us data of other people, it is your responsibility to collect such data in compliance with local legal requirements. For instance, you should inform such other people, whose data you provide to us, about the content of this Notice and obtain their consent.

WHAT ARE YOUR CHOICES?

We aim to answer your request regarding your data. You can always contact our Office if you would like to:

- review, change or delete the data you have supplied us with (to the extent Tappointment Kft is not otherwise permitted or required to keep such data);
- object to certain data processing operations;
- receive a copy of your data (in a common machine readable format, to the extent it is required by applicable law);
- ask us any other questions related to the protection of your data in Tappointment

The contact details of our Office are:

- Mail: Tappointment Kft, Királýsor 30, Székesfehérvár, 8000, Hungary
- Online: www.huepower.com

We will do our best to address your request in time and free of charge, except where it would require a disproportionate effort. In certain cases, we may ask you to verify your identity before we can act on your request. If you are unsatisfied with the reply received, you may then refer your complaint to the relevant regulator in your jurisdiction.

HOW DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

For more information on how we use cookies and other tracking technologies, read our Cookie Notice (which can be found in the website of tappointment.com see “Cookies Policy” section).

DO WE COLLECT DATA FROM CHILDREN?

We do not intentionally collect information from children under the age of 16.

- Special note to Children under the age of 16: if you are under the age of 16, we advise that you speak with and get your parent or guardian’s consent before sharing your data with us;
- Special note to Parents of Children under the age of 16: we recommend you to check and monitor your children's use of our products, systems, services, applications (including websites and other digital channels) in order to make sure that your child does not share personal data with us without asking your permission.

WHEN WILL THERE BE UPDATES TO THIS PRIVACY NOTICE?

This privacy notice might change from to time.

The most current version of this Notice will govern our use of your data and can be found in the website https://huepower.com/huepower_privacy_policy.pdf, see “Privacy Policy” section.