



# PRIVACY STATEMENT

This privacy statement conforms to the European legislation on General Data Protection Regulation (GDPR).

## SHIPPING AND PAYMENT

To process orders, shipping and payments, we require your company information: your company name, address information and contact information (name, email address and phone number). Shipping is performed by a package delivery service<sup>1</sup>. This requires your name and address information to be shared with this party. In case of increasing payment arrears, we will share your company information with a collection company<sup>2</sup>, to collect the outstanding payment. The companies involved will use your information only to perform these tasks, but retain the right to use your information to further improve their services and therefore share (anonymized) information with third parties. The guarantees mentioned above with regard to the protection of your personal data also apply to the parts of their services for which they engage third parties. Your data will not be stored longer than is permitted under the legal terms.

## SUPPORT AND WARRANTY

When registering one of our products, we request your information on the *My xxter* environment: your (company) name, contact name, address information, email address and phone number. This information is used by xxter to be able to offer support and warranty. Your email address is used if you need to reset your password. Additionally, it can be used to inform you about important updates that have become available or for an invitation on a survey on your experiences with our services. You can view and change your data in the *My xxter* environment. This data will not be shared with third parties. Your information will be stored as long as you have registered one of our products.

## CONTROL AND VISUALISATION

To be able to use our products, they need to be configured. Of the xxter or Pairot device the local and external IP information, and the dynamic DNS name are stored, to allow you to connect to the device. The geographic coordinates you have provided with the registration are stored to be able to determine the correct local sunrise and sunset time. These data can be viewed by yourself or your installer on the device or on the *My xxter* environment. This information will be stored as long as you have registered one of our products.

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For the control and visualization it is necessary that your project and profile configuration is stored. This concerns the component information of the technical (KNX, DMX, Modbus, Bacnet, Hue, enOcean, etc.) installation, together with optional information about intercom, camera or audio/video equipment and (when applicable) the profile for the visualization in the app. This information and the corresponding KNX project information can be viewed and edited by you or your installer in the *My xxter* environment. To use presence detection, you can provide the MAC address of your mobile phone allowing the xxter controller to detect your device on your home network. All this information is only used for the control and visualization of your home or building and will not be shared with third parties. In case you are using voice control, you will link your account with one of the voice assistant services<sup>3</sup> and therefore permitting to share your component information with these parties. This will allow you to control and visualize your home with these services, in accordance with their terms and conditions. When using the xxter app, your user information will be encrypted on your (mobile) device, to make sure no third party has access to this information.

To be able to use the alert service of xxter, we store an identification key of the (mobile) devices you use for xxter. When setting up the alert service you can use these keys to send push messages to these devices, or provide an email address or phone number, whereon you can receive an email or sms text message in situations you have configured. This information can be viewed and edited by you or your installer in the *My xxter* environment and are never used for any other purpose then for the alert service you have set up. To be able to send the alert messages, we make use of message service providers<sup>4</sup>. The companies involved will use your information only to perform these tasks, but retain the right to use your information to further improve their services and therefore share (anonymized) information with third parties.

Together with the alert service, you can configure snapshots (photos) to be taken by one of your cameras and sent with the message. These images can be viewed and removed in the *My xxter* environment by you or your installer and are never shared with third parties. The images are stored for a maximum of 1 year.

For troubleshooting it is possible to send log files from the device and the apps to xxter. You can also make (automatic) backups of your configuration. This information is only used for troubleshooting and never shared with third parties. Automatic backups will be stored for a maximum of 4 weeks. The other information will be stored as long as you have registered the device.

When you request support from xxter, if needed, xxter will have access to the same information in the *My xxter* environment as you or your installer, for the duration of your support request. This access will only be used to assist you in your support request and never shared with third parties.

## **NEWSLETTERS AND CONTACT FORMS**

In case you want to receive our newsletter, you can provide your email address on the contact form of our website. For the sending of newsletters, we make use of a newsletter service provider<sup>5</sup>. For this service, it is required that we share your email address. This company will use your information only to perform this service, but retain the right to use your information to further improve their services and therefore share (anonymized)

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information with third parties. Below every newsletter there is a 'unsubscribe' link, with which you can unsubscribe. Your email address will then be removed from the database.

When you contact us, you can provide your name, email address and/or phone number and optionally your address information in our contact or call me back forms. We will use this information only to contact you, and possibly for an invitation on a survey on your experiences with our services. Your information will not be used for other purposes and will not be shared with third parties. Your data will not be stored longer than is permitted under the legal terms.

## WEB PAGE USE

Our website can place cookies from Google, as a part of their Analytics services. We use this service to gain insight in how our visitors use the website. Google may be required to provide access to this data on the basis of applicable laws and regulations. We collect information on your online behavior on our website and share this information with online marketing service providers<sup>6</sup>. These companies can interpret this data together with other datasets and track your movement on the internet. This information is also used to offer targeted advertisements (Adwords) and other Google services and products. This services make use of cookies. You can turn off cookies by configuring your internet browser to not store cookies. Additionally, you can remove all previously stored cookies through the settings of your internet browser.

## YOUR RIGHTS

Based on the applicable legislation in the Netherlands and Europe, you have certain rights with regard to the personal data processed by or on behalf of us. If you want to make use of your right to object, the right to inspect and / or the right to data transferability or if you have other questions / comments about data processing, please send a specified request to our support department, [support@xxter.com](mailto:support@xxter.com).

You have the right to submit a complaint to the Dutch Data Protection Authority at any time if you suspect that we are using your personal data in the wrong way.

## SECURITY

xxter takes the protection of your data seriously and takes appropriate measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes. If you have the impression that your data is not properly protected or there are indications of abuse, please contact our support department, [support@xxter.com](mailto:support@xxter.com).

## CHANGES

We reserve the right to change our privacy policy at any time. However, you will always find the most recent version on the <https://xxter.com/proclaimer> page. If the new privacy policy has consequences for the way in which we process already collected data with regard to you, we will inform you of this by e-mail.

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## OVERVIEW OF COOPERATING THIRD PARTIES

To provide our services, we sometimes use services of third parties. In the above text, we refer to these parties. We currently work with the following parties:

1	Package delivery	UPS, United Parcel Service, Inc. DHL, Deutsche Post AG
2	Collection company	Ultimoo Incasso B.V.
3	Voice assistant services	Amazon Alexa, Amazon Inc. Google Home, Google Inc. <i>Note: when using HomeKit, Apple Inc. does not have access to your home</i>
4	Messaging services	Apple push notification service, Apple Inc. Google push notification service, Google Inc. MessageBird sms services, MessageBird BV
5	Newsletter services	MailChimp, the Rocket Science Group LLC
6	Online marketing services	Google Analytics & Adwords, Google Inc.