

HUB CONTROLS PRIVACY NOTICE

1. Scope

- 1.1. All data subjects whose personal data is collected in line with the requirements of the GDPR.

2. Responsibilities

- 2.1. The GDPR Owner is responsible for ensuring that this notice is made available to data subjects prior to Hub Controls Ltd collecting/processing their personal data.
- 2.2. All Employees/Staff of Hub Controls Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

- 3.1. Who are we?

HUB Controls Ltd is an award-winning Irish tech company in the home automation/energy management sector. Founded in 2014 by CEO Oliver Hynes, Hub Controls Ltd launched the first product, a state of the art smart thermostat called the HUB Controller in November 2016.

Our GDPR representatives can be contacted directly here:

- Email: privacy@hubcontrols.com
- Phone: +353 1 901 0367

- 3.2. Information we collect

The personal data we would like to collect and process from you if you are a customer or a prospective customer:

Data you provide directly

Data type	Details	Purpose	Storing	Processing	Sharing	Lawful basis for processing
Contact data	Full name	Standard business activity	Yes	Yes	Installation partner	Consent Legitimate interests Compliance with law
	Address		Yes	Yes		
	Email address		Yes	Yes		
	Telephone/mobile number	Advertising ¹	Yes	Yes		
Payment data	Credit/debit card numbers, security code numbers and other related billing information	Transaction support	Never	Yes, only for payment	Never	

Automatically collected data

Data type	Details	Purpose	Storing	Processing	Sharing	Lawful basis for processing
Environmental data	Temperature, humidity and wifi signal strength	Normal product operation, support and improvement Data analytics and statistical research	Yes	Yes	Anonymous and aggregated data	Legitimate interests Consent
Product usage data	Energy usage, adjustments to thermostat settings, schedules and programs, heating system performance measurement and monitoring, and other information that affects energy usage.	Normal product operation, support and improvement Data analytics and statistical research	Yes	Yes	Anonymous and aggregated data	Legitimate interests Consent
Device data	First start date, model and serial number, software version, IP address and technical information such as battery charge level.	Normal product operation, support and improvement	Yes	Yes	No	Legitimate interests Consent

¹ Only where explicit consent was obtained

Application data	App version, user agent information (hardware model, application type, operating system)	Normal product operation, support and improvement Data analytics and statistical research	Yes	Yes	No	Legitimate interests Consent
Website	We collect information about your visits to and your activity on our website. To learn more, read our Cookie policy.	Data analytics and statistical research	Yes	Yes	No	Consent

Anonymous and aggregated Data

We collect anonymous and aggregated information about how our services are used. For security purposes, we apply a process of de-identification or pseudonymisation to your data (environmental and product usage data) to make it reasonably unlikely to identify you through the use of that data with available technology.

Information from third-party sources						
Data type	Details	Purpose	Storing	Processing	Sharing	Lawful basis for processing
Data brokers, social media networks and advertising networks	Commercially-available data, e.g. personal data may be collected when you access our applications through social media logins (i.e., logging in to our applications using your Facebook or other social media account). The basic details we receive may depend on your social network account privacy settings.	Direct marketing	Yes	Yes	No	Consent

We do not collect or process any type of sensitive personal data.

We do not knowingly collect information from children, and does not target its websites or mobile applications to children.

NOTE: IF YOU CHOOSE NOT TO PROVIDE DATA

You are not required to share the personal data that we request, however, if you choose not to share the information, in some cases we will not be able to provide you with our services, certain specialized features or be able to effectively respond to any queries you may have.

3.3. Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Hub Controls Ltd to process personal data, but it must be explicitly given.

You may withdraw consent at any time by completing a Data subject consent withdrawal form which can be found at <https://hubcontrols.com/privacy>. You may also update your preferences on any email communications you may receive from us.

3.4. Disclosure

We will not pass on your personal data to third parties without first obtaining your consent. We will not pass on your details to any third parties for marketing purposes. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

Organisation	Safeguards in place to protect your personal data
Installation partner	Encrypted transfer

3.5. Retention period

We do not store the personal data for longer than is legally permitted and necessary for the related processing purposes. The retention period depends on the type of personal data, the purposes and the applicable law and therefore varies per use.

We will store and process personal data for as long as you are using our Services or for as long as we have another purpose to do so and, thereafter, for no longer than is required or permitted by law or necessary for internal reporting and reconciliation purposes.

We erase personal data after the above described retention period or when you request us to erase your personal data.

3.6. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review – in the event that Hub Controls Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.7 below.

3.7. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Hub Controls Ltd or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Hub Controls Ltd's data protection representative at privacy@hubcontrols.com.

The details for each of these contacts are:

	Supervisory authority contact details	GDPR Owner contact details
Contact Name:	Data Protection Commissioner	Hub Controls Ltd
Address line 1:	21 Fitzwilliam Square	Synergy Centre, IT Tallaght
Address line 2:	Dublin 2	D24 A386
Address line 3:	Ireland	Ireland
Email:	info@dataprotection.ie	privacy@hubcontrols.com
Telephone:	+353 57 8684800	+353 1 901 0367

3.8. Privacy statement

Read more about how and why we use your data here:
<http://hubcontrols.com/privacy>

4. Online privacy statement

What is personal data?

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

We do not consider personal data to include information that has been anonymized or aggregated so that it can no longer be used to identify a specific natural person, whether in combination with other information or otherwise.

The provision of all other personal data is voluntary, but may be necessary in order to buy and use our products. We may also collect personal data from other sources, as described above [3.2].

How we use your information

We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs. This privacy notice tells you how we, Hub Controls Ltd, will collect and use your personal data. We collect and use personal data to manage your relationship with Hub Controls Ltd and better serve you when you are using our product(s) by personalizing and improving your experience. Examples of how we use data include:

STANDARD BUSINESS ACTIVITY

- **Transaction support** - Assisting you in completing transactions and orders of our products or services, processing payments, arranging shipments and deliveries and facilitating repairs and returns.
- **Customer experience** - Providing you with a seamless customer experience by maintaining accurate contact data, delivering comprehensive customer support, offering products, services, subscriptions and features that may interest you and enabling you to participate in contests and surveys. We also use your data to deliver a tailored experience, personalize the communications you receive and create recommendations based on your use of Hub Controls Ltd's product(s).
- **Normal product operation, support and improvement** - Ensuring normal device operation enabling additional features e.g. mobile apps. Improving the performance and operation of our products, solutions, services and support, including warranty support and timely firmware and software updates and alerts to ensure the continued operation of the device or service.
- **Administrative communication** - Communicating with you about Hub Controls' services. Examples of administrative communications may include responses to your inquiries or requests, warranty-related communications, or communications required by law.
- **Security** - Maintaining the integrity and security of our websites, products, features and services and preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring device ID, before granting access to your personal data.
- **Business operations** - Conducting ordinary business operations, verifying your identity, conducting business research and analytics, corporate reporting and management, staff training and quality assurance purposes (which may include monitoring or recording calls to our customer support).

DATA ANALYTICS AND STATISTICAL RESEARCH

- **Features normal function and improvements** – some of the Hub Controller features (e.g. budget control feature) require automatic data analysis to ensure normal operation.
- **Research and innovation** - Innovating new products, features and services using research and development tools and incorporating data analysis activities.
- **Website** – We may also collect details of your visits to our site (including, but not limited to, traffic data, location data, weblogs and other communication data), and the resources that you access. When you access our website, your computer's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data on the use of our website. This information may be used to help us to improve our site and the services we offer. See our Cookie Policy.

DIRECT MARKETING

We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at privacy@hubcontrols.com.

COMPLIANCE WITH LAW

Compliance with applicable laws, regulations, court orders, government and law enforcement requests, to operate our services and products properly and to protect ourselves, our users and our customers and to solve any customer disputes.

Why do we need to collect and store personal data?

In order for us to provide you our services we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes we would contact you for additional consent.

Will we share your personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Hub Controls Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide you on our behalf. When they no longer need your data to fulfill this service, they will dispose of the details in line with Hub Controls Ltd's procedures. If we wish to pass your personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will we use your personal data?

We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Hub Controls Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and

agreed practices. Personal data may be held in addition to these periods depending on individual business needs. For more information see [3.2].

Under what circumstances will we contact you?

We may use technologies considered automated decision making. We will not make automated-decisions about you that would significantly affect you, unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are required by law to use such technology. Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can you find out the personal data that we hold about you?

Hub Controls Ltd at your request, can confirm what information we hold about you and how it is processed. If we do hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection representative, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Hub Controls Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will you need to provide in order to access this?

We accept the following forms of ID when information on your personal data is requested:

- Government issued photo ID such as a current driving license or passport
- Birth certificate

Contact details of the GDPR Owner:

Contact Name:	GDPR Owner Hub Controls Ltd
Address line 1:	Synergy Centre, IT Tallaght
Address line 2:	D24 A386
Address line 3:	Ireland
Email:	privacy@hubcontrols.com
Telephone:	+353 1 901 0367

5. Document Owner

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all staff and customers.

Last updated: May 20, 2018