

mwLink™ Dashboard Privacy Notice

PLEASE READ THIS PRIVACY NOTICE BEFORE USING MWLINK DASHBOARD INCLUDING THE WEBSITE AND ALL ASSOCIATED SOFTWARE AND SERVICES, REFERRED TO COLLECTIVELY AS THE “MWLINK DASHBOARD”. THIS PRIVACY NOTICE GOVERNS THE TYPES OF INFORMATION AND DATA WE COLLECT AND HOW WE USE AND SHARE THIS INFORMATION. YOUR ACCESS TO AND USE OF MWLINK DASHBOARD ARE AVAILABLE FOR YOUR USE ONLY ON THE CONDITION THAT YOU AGREE TO THE TERMS OF USE WHICH INCLUDE THE TERMS OF THE PRIVACY NOTICE SET FORTH BELOW.

We respect your concerns about privacy. This Privacy Notice describes the types of personal data we collect about users. This notice covers how we may use the information and with whom we may share it or use in other products and services. The notice also describes the measures we take to safeguard your personal data. In addition, we tell you how you can ask us to (i) access or change the personal data we maintain about you, (ii) withdraw consent you previously provided to us, and (iii) answer questions you may have about our privacy practices. Our privacy practices may vary among the countries or territories in which we operate to reflect local practices and legal requirements.

1. Parties to this Privacy Notice

The parties to this Privacy Notice are McWong International Inc. (dba mwConnect) (“McWong”, “mwConnect”, “we”, “us”, or “our”) and the user (“customer”, “user”, “you”, or “your”) of the mwLink Dashboard and related API services (“mwLink Dashboard”, “mwLink”, “APIs”, or “services”).

2. The Data Controller

The controller of your data is:

McWong International Inc. (dba mwConnect) with head offices at 1921 Arena Blvd, Sacramento, CA, USA 95834.

3. Information We Obtain

We may obtain information in connection with various activities such as (i) use of the mwLink Dashboard, and (ii) questions you may ask.

The information we may obtain concerning your personal data may include:

- a) your email and other credentials used to access our mwLink Dashboard including the website, software and services;*
- b) individual and business contact information (such as name and company name);*
- c) Building address of the lighting control Site accessed by the mwLink Dashboard;*
- d) IP address and geographic locations of your web browser;*
- e) other personal information that may be provided to us to obtain requested products or services.*

We also use and obtain other types of data which do not concern your personal data but are required to operate, analyze, enhance, and improve our commissioning service.

4. How We Use the Information We Obtain

Upon your consent, we may use your personal data for the following purposes:

- a) to create your account: type of personal data: [email, name, company name],
- b) to verify your email and that you have accepted the Terms of Use: type of personal data: [email],
- c) to provide technical support and respond to your requests, questions and comments: type of personal data: [email, name, company name],
- d) to perform processing and collecting payments for mwLink Dashboard services: type of personal data: [email, name, company name, company address],
- e) to perform accounting, auditing, billing, reconciliation and collection activities: type of personal data: [email, name, company name, company address],
- f) to protect against, identify and prevent fraud and other criminal activity, claims and other liabilities: type of personal data: [email, name, company name, IP address, user geolocation, building address];
- g) to comply with applicable legal requirements and our policies: type of personal data: [email, name, company name, IP address, user geolocation, building address];
- h) to supply, operate and maintain mwLink Dashboard: type of personal data: [email, name, company name, IP address, user geolocation, building address];
- i) to analyze, enhance and improve the mwLink Dashboard (including developing new features and services): type of personal data: [email, name, company name, IP address, user geolocation, building address];
- j) to anonymize or perform aggregation of data: type of personal data: [email, name, company name, IP address, user geolocation, building address].

Your personal data will be stored for as long as the relevant consent remains active and is not withdrawn or until the expiration of claims resulting from providing the mwLink Dashboard service, whichever is longest. We also use the data we obtain to help diagnose technical and service problems, administer mwLink Dashboard, and identify users of the mwLink Dashboard.

5. Information We Share

We may share your personal data with:

- a) persons or entities providing particular services to us (accounting, legal, IT, marketing and advertising services) – to the extent required to provide these services;
- b) our affiliates, employees and contractors – to the extent required to supply, operate and maintain the mwLink Dashboard;
- c) any entity or authority required by the law, or when it is necessary or appropriate to prevent physical harm or financial loss.

We do not sell or otherwise share your personal data, except as described in this Privacy Notice.

6. Rights of the data subject

Subject to applicable law, you have the right:

- a) to access your personal data by requesting sharing and/or sending a copy of all your personal data processed by us;
- b) to request rectification of inaccurate personal data by indicating the data requiring rectification;
- c) to request erasure of your personal data; we have the right to refuse to erase the personal data in specific circumstances provided by law;
- d) to request restriction of processing of your personal data by indicating the data which should be restricted;
- e) to object to processing your personal data conducted based on grounds relating to your particular situation;
- f) to withdraw the consent to process your personal data at any time. Withdrawal of the consent is possible solely in the scope of processing made based on consent. We are authorized to process your personal data after withdrawal your consent if we have the legal basis for such processing, for the purposes defined by that legal basis;
- g) to lodge a complaint with a supervisory authority, in your state of residence.

The rights mentioned in (a) to (g) above may be realized by contacting us as indicated in the "How to Contact Us" section of this Privacy Notice. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated below.

7. Data Transfers

We may transfer the personal data we collect about you to the following countries other than the country in which the information originally was collected:

- United States of America.

The above countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Privacy Notice and in accordance with applicable law.

mwLink makes use of Microsoft Azure webservices and Google Cloud Platform webservices. These services maintain their databases in the United States of America.

8. How We Protect Personal Data

We use appropriate administrative, technical and physical safeguards to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

9. Updates To Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our mwLink Dashboard to notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was last updated.

10. How to Contact Us

If you have any questions or comments about this Privacy Notice, or if you would like us to update information we have about you or your preferences, please contact us by e-mail using the Contact Us email link in the mwLink Dashboard, or you may write to us at:

McWong International Inc. (dba mwConnect)

1921 Arena Blvd

Sacramento, CA

USA 95834

ATTN: mwLink Support

Privacy Notice Addendum

Addendum to Privacy Notice for Canada

Personal information maintained and processed by our mwConnect affiliates and third-party service providers in the U.S. and other foreign jurisdictions may be subject to disclosure pursuant to a lawful access request by U.S. or foreign courts or government authorities. We will not provide your information to third parties for marketing purposes without your prior consent. For more information about our privacy practices; to access, update or correct inaccuracies in your personal information; or if you have a question or complaint about the manner in which we or our service providers treat your personal information, please contact us using the method(s) described in the "How to Contact Us" section.

Addendum to Privacy Notice for Mexico

To the extent Mexican privacy laws or regulations apply, the following additional Mexico-specific provisions apply and shall prevail over conflicting provisions in the Privacy Notice.

How We Use the Information We Obtain

In addition, we may use your personal information for the other purposes listed in the "How We Use the Information We Obtain" section of the Privacy Notice, which may be considered secondary purposes under Mexican law. We do not use or share personal payment or financial information except in connection with the processing of payments or where there is another legal basis. You may withdraw your consent to our processing of your personal information by contacting us as indicated in the "How to Contact Us" section of the Privacy Notice. If you withdraw your consent for us to process your personal information for one of the primary purposes indicated above, then in some situations we may not be able to provide the service, though we may still engage in certain processing authorized by law. mwConnect may also use mwLink Dashboard data and related data analysis in other mwConnect products and services.

Information We Share

We may share your personal information as provided in the Privacy Notice, but to the extent permitted by law, you may withdraw your consent to this sharing by contacting us as indicated in the "How to Contact Us" section of the Privacy Notice.

We also share the mwLink Dashboard and related information we obtain with our customers, partners, affiliates, and joint marketing partners. These entities, which collectively are referred to here as the "mwConnect Business Partners," may use the information for the purposes described in this Privacy Notice.

We may also share the mwLink Dashboard usage information, physical location of lighting control networks, and performance of lighting control networks with our mwConnect Business Partners and other third parties for warranty, troubleshooting or maintenance purposes, or for improving the design and performance of their products and services.

Requests for Access, Correction, Cancellation, Objection or Consent Withdrawal

In addition to any rights granted in the Privacy Notice, you may ask us to cancel your personal information to the extent permitted by law by contacting us as indicated in the "How to Contact Us"

section of the Privacy Notice. Following a valid cancellation request, we may hold the personal data for the duration and purposes permitted by law before deleting it. We will answer your requests to access, correct or cancel your personal information or to object or withdraw your consent to our processing of your personal information within 20 business days from the date we receive your complete request or as provided by law. To be considered complete, your request must include your full name and contact address, a copy of your ID and a clear and detailed description of your request.