

Seymour Connect Privacy Policy

Effective Date: December 1, 2024

At Delta Controls ("we," "us," "our"), we are committed to protecting your privacy and safeguarding your personal information. This Privacy Policy outlines how we collect, use, disclose, store, retain, and protect your personal information when you use the Seymour Connect Management Portal and the Seymour Connect mobile application (the "Software").

By using the Software, you consent to the collection, use, and disclosure of your personal information as described in this Privacy Policy. If you do not agree with this policy, please do not use our Software.

1. Information We Collect

Personal Data You Provide:

- **Account Information:** When you create an account, we collect your name and email address.
- **Authentication Data:** The password you create is encrypted at the time of collection, and we cannot decrypt it.

1

Data Collected Automatically:

- **Device Data:** We collect data related to your HVAC system, such as device identifiers, system settings, and operational data.
- **Usage Data:** Information about how you use the Software, including access times, pages viewed, and interactions with features.

Cookies and Similar Technologies:

- We use cookies and similar tracking technologies to enhance your experience, analyze usage, and deliver personalized content. You can control the use of cookies through your browser settings.

Children's Privacy:

- Our Software is not intended for use by individuals under the age of 16. We do not knowingly collect personal information from children under 16. If we become aware that a child has provided us with personal data, we will take steps to delete such information promptly.

2. Legal Bases for Processing Personal Data

Head Office

17850 56 Ave. Surrey
BC Canada V3S 1C7

Phone/Fax

Tel +1 604.574.9444
Fax +1 604.574.7630

Web /Email

info@deltaccontrols.com
www.deltaccontrols.com



We process your personal data based on the following:

- **To Provide Our Services:** Processing is necessary to provide the services you have requested.
- **Your Consent:** You have given explicit consent for specific purposes. You may withdraw your consent at any time by contacting us.
- **Legitimate Interests:** Processing is necessary for our legitimate interests in improving our services, provided it does not override your rights.
- **Compliance with Legal Obligations:** Processing is necessary to comply with our legal obligations.

3. How We Use Your Information

We use your personal information for the following purposes:

- **To Provide and Maintain Our Services:** Authenticate you into the Software, enable access, and allow you to monitor and control your HVAC system.
- **Customer Support:** Respond to your inquiries, provide assistance, and improve customer service.
- **Service Improvements:** Analyze usage to enhance the functionality and user experience of the Software.
- **Notifications and Alerts:** Send you notifications, alerts, and updates related to your HVAC system and the Software.
- **Legal Compliance:** Comply with applicable laws, regulations, and legal processes.

2

4. Information Sharing and Disclosure

We may share your personal information under the following circumstances:

- **With Administrators:** Administrators of the Software can access your name and email to assign permissions and levels of access to your account.
- **Service Providers:** We share information with trusted third-party service providers (e.g., Amazon Web Services for data hosting) who process data on our behalf under agreements that require them to protect your information.
- **Legal Requirements:** We may disclose your information if required to do so by law or in response to valid requests by public authorities.

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- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your personal information may be transferred. We will notify you before your personal data is transferred and becomes subject to a different privacy policy.
- **With Your Consent:** We may disclose your personal information for any other purpose with your explicit consent.

5. International Data Transfers

Your personal information may be transferred to and processed in countries other than your country of residence. These countries may have data protection laws that are different from the laws of your country.

- **Safeguards:** When transferring personal data internationally, we take steps to ensure your data remains protected.
- **Data Storage:** The Software stores your personal information on servers located in Canada.

6. Your Rights and Choices

Depending on your location and applicable laws, you may have certain rights regarding your personal data, such as:

- **Right to Access:** Request access to the personal data we hold about you.
- **Right to Rectification:** Request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** Request deletion of your personal data under certain circumstances.
- **Right to Restrict Processing:** Request restriction of processing your personal data.
- **Right to Data Portability:** Receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Object to the processing of your personal data based on legitimate interests or direct marketing.
- **Right to Withdraw Consent:** Withdraw consent at any time where we are relying on consent to process your personal data.

Exercising Your Rights:

- To exercise your rights, please contact us at **privacyofficer@deltaccontrols.com**.
- We may request verification of your identity before fulfilling your request.
- We will respond to your request within a reasonable time frame.

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7. Data Retention

- **Retention Period:** We retain your personal information for as long as your account is active or as needed to provide you services.
- **Account Closure:** After you decide to close your account, we will retain your information for up to 2 years to comply with legal obligations, resolve disputes, and enforce agreements, unless a longer retention period is required or permitted by law.
- **Anonymized Data:** We may retain anonymized or aggregated data indefinitely for analytical purposes.

8. Information Security

We implement appropriate technical and organizational security measures to protect your personal information from unauthorized access, alteration, disclosure, or destruction. These measures include:

- **Encryption:** Data encryption in transit (SSL/TLS) and at rest.
- **Access Controls:** Restricting access to personal data to authorized personnel only.
- **Security Assessments:** Regular security audits and assessments.
- **Incident Response Plan:** Established procedures to address any suspected data breaches.

4

Despite our efforts, no security measures are entirely foolproof. We cannot guarantee absolute security of your personal information.

9. Notification About Security Breaches

If we become aware of a security breach that affects your personal information, we will notify you as required by applicable laws. We will provide you with information on the nature of the breach and recommended protective measures.

10. Automated Decision-Making and Profiling

We do not engage in automated decision-making or profiling that produces legal or similarly significant effects concerning you.

11. Third-Party Links

The Software may contain links to third-party websites or services. We are not responsible for the privacy practices or content of these third parties. We encourage you to review the privacy policies of any third-party websites or services you visit.

12. Cookies and Tracking Technologies

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We use cookies and similar technologies for various purposes, including:

- **Essential Cookies:** Necessary for the operation of the Software.
- **Performance Cookies:** Collect information about how you use the Software.
- **Functionality Cookies:** Remember choices you make to improve your experience.
- **Analytics:** We may use third-party analytics tools to help us understand how users engage with the Software.

Managing Cookies:

You can control cookies through your browser settings. However, disabling cookies may affect the functionality of the Software.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons.

- **Notification of Changes:** We will notify you of any significant changes by posting the new Privacy Policy on this page and updating the "Effective Date" at the top.
- **Advance Notice:** For material changes, we will provide notice before the changes become effective.
- **Consent to Changes:** Your continued use of the Software after the effective date signifies your acceptance of the updated Privacy Policy.

5

14. Contact Information

If you have any questions, concerns, or requests regarding this Privacy Policy or our handling of your personal information, please contact us:

- **Email:** privacyofficer@deltacontrols.com
- **Mailing Address:** Delta Controls
Attn: Privacy Officer
1750 56 Ave, Surrey, BC, Canada, V3S 1C7

15. Regulatory Authorities

If you believe that we have not adequately addressed your privacy concerns, you have the right to lodge a complaint with the relevant data protection authority in your jurisdiction.

16. Accessibility and Language

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We are committed to making our Privacy Policy accessible to all users, including those with disabilities. This Privacy Policy is available in multiple languages to ensure accessibility for all users.

17. Accountability and Compliance

We regularly review our privacy practices and maintain records of our processing activities to ensure the ongoing protection of your personal information.

18. Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws applicable in your place of residence, without regard to its conflict of law provisions.

By using the Software, you acknowledge that you have read and understand this Privacy Policy and agree to its terms.

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