

## **Cococam** Application Privacy Policy

Latest updated date: August 22, 2021

**Shenzhen C-tronics Co., Limited** (“We” or “**Ctronics**”) is committed to protecting your privacy. This mobile privacy policy (hereinafter referred to as the “this policy”) describes how we handle personal information and secure privacy during your use of the following services, products, and related mobile applications (collectively called the “Products”).

- **Cococam** Mobile App

When you interact with our products, please be sure to carefully read the privacy policy and understand the purpose and security measures we collect, process your personal data, including how we use, store, share and transfer personal data. In this policy, you may enforce your privacy rights to personal data, access, deletion, etc. through our instructions.

When you agree to this privacy policy, or start and continue to use our products or services appropriately, and do not contact us to express the contrary, we will consider that you fully understand and agree to this policy. If you have any questions, comments, suggestions, or complaints during the reading process, please contact us through the following contact information:

Customer Service: [info@cococamtech.com](mailto:info@cococamtech.com)

Privacy Office: [info@cococamtech.com](mailto:info@cococamtech.com)

For the mobile applications of other brands that support services provided by **Ctronics**, our customers will decide which personal information to collect through our products, so the privacy policy does not apply to the principles of other brands' collection or processing of personal information. We collect information at customer requirements and limited to providing services agreed with us. If you are a user of our customer, and you do not want customers who use our services to contact you, please contact the customer directly and inform your request.

Definition

*In this policy,*

*Personal Information: Information that can be used for use individually or with other information or reflects the activities of a particular individual.*

*Personal Sensitive Data: It includes personal biometric data, exact location information. When we provide you with a specific product or service related to the collection of personal sensitive data, we obtain your consent with significant and explicit notice prior to collecting your personal sensitive data.*

*Intelligent Equipment: It refers to non-standard computing devices produced or manufactured by hardware manufacturers that have a human-machine interface and can transmit information through a wireless network, including smart cameras, etc.*

*Application: It refers to a mobile application developed by Ctronics, which can help end users to remotely control smart devices and connect to Ctronics' Internet of Things (IoT) platform.*

*What personal information do we collect?*

To provide you with our services, we will ask you to provide the personal information necessary for such services. If you do not provide personal information, we may not be able to provide you with our products or services.

Firstly, the information you voluntarily provide to us.

- **Account or Personal Information:** When you register our account, we may collect your name and contact information, such as your email address, phone number, user name, and login credentials. During your interaction with our products, we may further collect the nickname, avatar, country code, language preferences, or time zone information in your account.

If you choose to authorize the use of the third-party account login, we will obtain the account information you share from the third-party (such as avatar, nickname, region, gender, and other information) binding with your **Ctronics** account for quick login, we will according to the agreement with the third-party, and the privacy policy published by the third-party about sharing personal information, on the premise of compliance with relevant laws and regulations, use your personal information.

- *Feedback: When you use the feedback and advice features in our products, we collect your email address, phone number, and feedback to handle your problems and equipment failures promptly.*

*At the same time, Ctronics collects personal information corresponding and necessary, according to your application products and services.*

*Secondly, the information that we collect automatically.*

- *Device Information: When you interact with our products, we automatically collect device information such as the MAC address, IP address, wireless connection information, operating system type, and version, application version number, push notification identifier, log file, and mobile network information.*

- *Usage Information: During your interaction with our website and services, we automatically collect usage information related to accessing, clicking, downloading, sending/receiving messages, and other users of our website and services.*

- *Log Information:* When you use our application, the system and exception logs may be uploaded, including your IP address, language, version of the operating system, date, or time of access, etc.

*Please note that separate device information, service log information is information that cannot identify a specific natural person. If we use such non-personal information with other information to identify a specific natural person or with personal information, such non-personal information will be regarded as personal information during the combined use, except for your authorization or otherwise provided by laws and regulations.*

- *Location Information:* When you open the positioning function of your mobile device through the system authorization and use location-based services, we collect and use your location information so that you can use the focus app to distribute with the smart device. As well as when you use our specific product or service, we may collect real-time accurate or non-accurate geolocation information about you. You can turn off the location service in the system of your mobile device and stop our collection of information about your location.

*Thirdly, Smart device-related information.*

- *Smart Device Basic Information:* When you use smart devices connected to our product or services, we may collect basic information about smart devices, such as device name, device ID, online status, activation time, firmware version, and upgrade information.
- *Information about Smart Device Reporting:* Depending on the different smart devices you choose to connect to our product or service we may collect information about your smart device reports. For example, a smart camera may collect images or videos that it takes.

*\*Purpose and legal basis for dealing with personal information\**

*We process your information for the following purposes:*

- *Serve You:* We handle your account and profile information, device information, use information, location information, and intelligent device-related information to provide the products and services you request. The legal basis for such treatment is the performance of our contract with you under our Terms of Use.
- *Improve our Services:* We process your device information, use information, location information, and smart device-related information to ensure the functionality and security of our products, develop and improve our products and services, analyze our

operational efficiencies, and prevent and track fraud or misuse. The legal basis for such treatment is the performance of our contract with you under our Terms of Use.

- *Non-Marketing Communications:* We process your personal information designed to send you important information related to the Services, Terms / conditions, and policy changes and / or other management information. Because this information is important, you may not be able to choose not to receive such messages. The legal basis for such treatment is the performance of our contract with you under our Terms of Use.

- *Compliance:* We will process your personal information as we consider necessary or appropriate: (a) compliance with applicable laws and regulations; (b) compliance with legal procedures; (c) responding to public agencies and government authorities; (d) fulfilling our terms and conditions; (e) protecting our operations, business and systems; (f) protecting the rights, privacy, security or property of us and / or other users including you; and (g) seeking the remedies available or limiting damages we may need to provide.



We may also use collect your personal information in other ways, where we will provide specific notice and obtain your consent as required by applicable law. If any change occurs in the purpose of processing your personal information, we will notify you of such changes by email and/or significant notice on our website and inform you of the selection of personal information.

*\*Who do we share your personal information?\**

**Ctronics** only shares your personal information in a way that you know. We will share your personal information with the following participants:

Firstly, we expose your personal information to third-party service providers offering us certain business-related services, such as website hosting, data analysis, payment and credit card processing, infrastructure supply, IT services, customer support services, email delivery services, and similar services, thus ensuring that they can provide us with other similar services.

Secondly, we disclose your personal information to customers who directly or indirectly provide you and other business partners with smart devices and/or the networks and systems you use to access and use our websites and sites and services.

Thirdly, we disclose your personal information to the affiliate or other third-party in any reorganization, merger, sale, joint venture, joint venture, transfer, transfer, or other disposition of any or other disposition of all or part of our business, assets, or shares (including, but not limited to, the above relating to any bankruptcy or similar procedure). In this case, you will receive a clear notice via email and/or our website of the change in ownership, the new incompatibility of personal information usage, and the selection of personal information.

Fourthly, when we consider it necessary or appropriate:

(a) Compliance with applicable laws and regulations;

(b) Compliance with legal procedures;

(c) Responding to the requirements of public and government authorities, including public and government authorities outside the country in which you reside;

(d) Performance of our terms and conditions;

(e) Protect our operations, business, and systems;

(f) Protect the rights, privacy, security, or property of us and/or other users, including you;

(g) Seeking the remedies available or limit damages we need to provide.

Fifthly, we disclose your personal information to the subsidiaries or affiliates of the company to conduct regular business activities.

Sixthly, except for the third parties mentioned above, we only disclose your personal information to other third parties with your consent.

The third-party SDK collection and use instructions

To ensure the stable operation or implementation of the **Ctronics** service, we may have access to the software development package (SDK) provided by a third party to achieve the aforementioned purpose. We conduct strict security testing on the application interface (API), Software Tool Development Package (SDK) for authorized partners to obtain relevant information and prescribe strict data

protection measures to process personal information in accordance with this policy and any other relevant confidentiality and security measures.

The third-party SDK we access mainly serves the needs of you and other users. Therefore, we may adjust the third-party SDK we access when meeting new service requirements and business function changes. We will promptly disclose to you the latest status of accessing third-party SDK in this description.

The situation of **Ctronics**' access to the third-party SDK is as follows (specifically, personal data collection is determined based on whether you use the following third-party services):

Function Modules and Services	Third-party Name	Details of Personal Information Collection	Privacy Policy Address
Third-party Account Login	Facebook third-party Account Login	General Equipment Information, Equipment Use Information, IP address, MAC Address	<a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>
Push the	Google FCM	the ID of Firebase Install	<a href="https://firebase.google.com/support/privacy">https://firebase.google.com/support/privacy</a>

Function Modules and Services	Third-party Name	Details of Personal Information Collection	Privacy Policy Address
Notification Function			
Video Service	Tutk	Smart Device Information, IP Address (iOS)	
Paypal SDK	Payment	Device Identification	<a href="https://developer.paypal.com/docs/policiesAndGuidelines/">https://developer.paypal.com/docs/policiesAndGuidelines/</a>

### *Rights relating to personal information*

*We respect your rights and will also have your personal information. You may exercise any of the following rights:*

- Through the “Me > Question Feedback” in our application;*
- Please email it to [info@cococamtech.com](mailto:info@cococamtech.com)*

*You can enforce your personal rights without paying any fees. According to the Local Information Protection Law, we will respond to your needs within fifteen working days.*

*If you decide to send us a request by email, please state what information you want to change, do you want to remove your personal information from our database, or what restrictions you want us to be subject to when using your personal information. Please note that for security reasons, we may request you to verify your identity before further processing your request.*

*You can be:*

- Request access to the personal information we process;*
- Ask us to correct the inaccurate or incomplete personal information related to you;*
- Request to delete your personal information;*
- Request temporary or permanent restrictions on our processing of part or all of your personal information;*
- Ask us to process your information based on your consent or contracts with you, and to transmit personal information to you or a third party when we automatically process your information;*

- When we use your personal information based on your consent or in our legitimate interests, we choose to oppose or reject our use of your personal information.

About cancellation account: you can cancel account through the following path: "My > Setting > Cancel account".

Improve our products and services

We may collect **encrypted International Mobile Device Identity Codes (IMEI) and network device addresses (MAC)**, as well as **cell phone models, system ID numbers, software crash logs** used to count the number of users, analyze product usage, screen crash causes, and reduce crashes to continuously improve our products. This information does not involve private information such as your personal identity.

Security guarantee measures

We take commercially reasonable physical, management, and technical safeguards to maintain the integrity and security of your personal information. **Ctronics** provides a variety of security strategies to effectively ensure information security for users and devices.

In terms of equipment access, we use **Ctronics'** proprietary algorithm to ensure data isolation, access authentication and authorization applications.

In terms of data communication, communication with the use of security algorithms and transmission encryption protocols and dynamic key-based business-level information encryption transmission is supported.

In data processing, strict data filtering and verification and a complete data audit process are adopted.

In terms of data storage, all the confidential information of the user will be safely encrypted for storage.

In addition to the above technical security, system, and control level, **Ctronics** also formulated a series of security, such as posts, hold security and privacy training courses, strengthen staff awareness of data protection, control access, to prevent data loss, illegal use, receive unauthorized access or leakage, tampering or damage.

If you believe for any reason that your interaction with us is no longer secure (e. g., you think the security of your core account is compromised), please send an email to **info@cococamtech.com** and inform us immediately.



If a security event affects your personal information security, we will immediately inform you through the reserved email address, phone number, message center push, and so on, and inform you of suggestions to reduce and prevent relevant risks. If necessary, we will take corresponding remedial measures in accordance with the emergency plan and report to the relevant competent departments in accordance with relevant regulations.

#### APP permission description

Firstly, microphone recording permission, the permission is mainly used to voice with the camera equipment through use, the user open, can communicate with the camera user, if it is turned off, the call cannot be made. Secondly, it allows access to the camera, photos, and video permission to save the camera image and video to the mobile phone, facilitate customers to capture the desired camera information. Some products support face recognition function, and APP will access the camera to collect and save face information through manual operation Thirdly, this permission to access WIFI information of the router. Fourth, this permission is mainly used to save equipment alarm pictures and some local configurations. If the user is closes, then APP may not be used normally.

#### How to destroy all of your personal information

*The user can select My-Setting-Logout account in the app, and after clicking destroy, our server will destroy all user information.*

#### *Information retention period*

*We will process your personal information within the minimum period for the purposes stated in the cost policy unless retained for a longer time under specific legal requirements. We will determine the appropriate retention period based on the quantity, nature, and sensitivity of our personal information, and after the end of the retention period, we will destroy your personal information. If we are unable to destroy the information for technical reasons, we will take appropriate steps to prevent your personal information from being further used.*

#### *Statement of policy change*

*We may update this policy at least once a year based on changes in information practices. If we make any major changes, we will notify you by e-mail (sent to the email address specified in your account) or posted on this site before the change takes effect. We recommend that you browse this page regularly for the latest information about privacy practices.*

Contact us

If you have any questions about our practices or this policy, please contact us:

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