PRIVACY POLICY

Update!

Our Privacy Policy was updated on 30th Nov 2020. We have revamped the Privacy Policy front and back so that from this date onwards, this Privacy Policy can provide privacy details on how we manage your personal information for Aqara Hub M1S products and services, unless a separate privacy policy is provided for a specific Aqara Hub M1S products or service provided by Lumi United Technology Co., Ltd.

Please take a moment to familiarize yourself with our privacy practices and let us know if you have any questions.

OUR COMMITMENT TO YOU

This Privacy Policy sets out how Lumi United Technology Co., Ltd. ("Lumi", "we", "our" or "us") collect, use, disclose, process and protect any information that you give us when you use Aqara Hub M1S products and services. Should we ask you to provide certain information by which you can be identified when using Aqara Hub M1S products and services, it will only be used in accordance with this Privacy Policy and/or our terms and conditions for users.

The Privacy Policy is designed with you in mind, and it is important that you have a comprehensive understanding of our personal information collection and usage practices, as well as full confidence that ultimately, you have control of any personal information provided to Lumi.

In this Privacy Policy, "personal information" means information that can be used to identify an individual, either from that information alone or from that information combined with other information Lumi has access about that individual. Such personal information may include but not limit to the information you provide to us or upload, device-related information, etc.

By using Aqara Hub M1S products and services, you are deemed to have read, acknowledged and accepted all the provisions stated here in the Privacy Policy, including any changes we may make from time to time. In order to comply with applicable laws, including local data protection legislation (e.g. General Data Protection Regulation in Europe Union), we will specifically seek prior explicit consent to the particular processing (e.g. automated individual decision-making) of special categories of personal data. We are committed to protecting the privacy, confidentiality and security of your personal information by complying with applicable laws, including your local data protection legislation. We are equally

committed to ensuring that all our employees and agents uphold these obligations.

Ultimately, what we want is the best for all our users. Should you have any concerns with our data handling practice as summarized in this Privacy Policy, please contact our Data Protection Officer at privacy@lumiunited.com to address your specific concerns. We will be happy to address them directly.

WHAT INFORMATION IS COLLECTED AND HOW WE CAN USE IT

TYPES OF INFORMATION COLLECTED

In order to provide our services to you, we will ask you to provide personal information that is necessary to provide those services to you. If you do not provide your personal information, we may not be able to provide you with our products or services.

We will only collect the information that is necessary for its specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. We may collect the following types of information (which may or may not be personal information):

- **Device information：** We may collect following information you provide to us, including your Mi Account, other Mi Account this device is shared with, device name, manufacturer, device model, firmware version, serial number, hardware version, battery voltage, device board temperature, device assigned location information, network information, device time zone, software system version, desktop shortcut settings.
- **Network information.** We may collect information related to network, like Wi-Fi information, device IP, and MAC address.
- **Automation setting.** We may collect information related to your Automation setting, including automation name, language, automation execution logs, condition and action list, effective time period setting, execution result notification setting, enable or disable automation setting.
- **Information collected by Aqara Hub M1S.** We will collect information about your device settings, including night light on/off, color, brightness, guard modes and on/off setting, alarm timing setting, alarm trigger device list information, alarm delay effective time, Hub alarm ringtone list information, alarm volume, alarm red light flashing duration, linkage alarm list data, alarm messages and logs; night light settings, including illumination condition settings; color light settings; play ringtone settings, play ringtone volume, child device list information.
- **Feedback information:** In order to provide you with better user experience, we may collect information in order to follow up with your requests and feedbacks.

Such information include feedback description, photos, contact information and router model (optional).

HOW THE PERSONAL INFORMATION IS USED

Personal information is collected for providing services and / or products to you, and legal compliance on our part under applicable laws. You hereby consent that we may process and disclose personal information to our affiliated companies (which are in the communications, social media, technology and cloud businesses), Third Party Service Providers (defined below) for the purposes stated in this Privacy Policy.

We may use your personal information for the following purposes:

- Providing, processing, maintaining, improving and developing our goods and/or services to you, including after-sales and customer support and for services on your device or through our websites.
- Communicating with you about your device, service or any general queries, such as updates, customer inquiry support, information about our events, notices.

Here are more details on how we use your information (which may include personal information)

1. We may use the data related to Aqara Hub M1S to provide you with a remote view of night lights, alert status, check alarm history, control night light and alert switches, set alert, automatic night light, timed color light, snooze alarm clock, doorbell and other functions.
2. We may use data related to Automation to provide you with smart automation scenes. You may set up the automation mode details yourself. After setting up, automation scenes take effect. If you have not set it up, the data or functions we collect will not automatically make any decisions that affect the operation of the device.
3. We may use Battery Voltage, device board temperature of the Device data to provide you with low battery alert notifications and device failure notifications.
4. We may use the Shortcut settings, to provide you a shortcut to control the device quickly.
5. We may use the device name, manufacturer, model, firmware version, serial number, hardware version, software system data to calculate the number of activated devices and the number of devices connected, analyze the firmware version and push firmware update notifications.
6. We may use the Network Information, Device Time Zone data to analyze the network status of your device to help resolve your issue. In addition, we may further use IP information to get the rough statistics of the geographic location of the online device, but this will never disclose any other information about you, such as your geographic location information.

7. We may collect information about your feedback (contact information, description) to help us analyze and resolve issues raised by you and contact you in a timely manner to inform you of the solution to your problem.
8. We may use Mi Account this device is shared with, Mi Account to query the device bound to the account and ensure that whenever the device is accessed, it will be authorized.

DIRECT MARKETING

We may use your Mi Account to provide marketing materials to you relating to goods and services of Lumi companies and our business partners which offer network, mobile applications and cloud products and services. We will only so use your personal data after we obtain your prior explicit consent and involve a clear affirmative action or indication of no objection in accordance with local data protection laws, which may require separate explicit consent. You have the right to opt out of our proposed use of your personal data for direct marketing. If you no longer wish to receive certain types of email communications you may opt-out by contacting our Data Protection Officer at privacy@lumiunited.com. We will not transfer your personal data to our business partners for use by our business partners in direct marketing.

WITH WHOM WE SHARE YOUR INFORMATION

We do not sell any personal information to third parties.

We may disclose your personal information on occasion to third parties (as described below) in order to provide the products or services that you have requested.

Disclosure may be made to Third Party Service Providers and affiliated companies listed in this section below. In each case described in this section, you can be assured that Lumi will only share your personal information in accordance with your consent. Your consent to Lumi will engage sub-processors for the processing of your personal information. You should know that when Lumi shares your personal information with a Third Party Service Provider under any circumstance described in this section, Lumi will contractually specify that the third party is subject to practices and obligations to comply with applicable local data protection laws. Lumi will contractually ensure compliance by any Third Party Service Providers with the privacy standards that apply to them in your home jurisdiction.

SHARING WITH OUR GROUP AND THIRD PARTY SERVICE PROVIDERS

In order to conduct business operations smoothly in providing you with the full capabilities of our products and services, we may disclose your personal information

from time to time to our third party service providers which are our mailing houses, delivery service providers, telecommunications companies, data centers, data storage facilities, customer service providers, advertising and marketing service providers, and Lumi's representatives. Such Third Party Service Providers would be processing your personal information on Lumi's behalf or for one or more of the purposes listed above. If you no longer wish to allow us to share this information, please contact us at privacy@lumiunited.com.

SHARING WITH OUR GROUP'S ECOSYSTEM COMPANIES

Xiaomi works together with a cool group of companies, which together form the Mi Ecosystem. The Mi Ecosystem companies are independent entities, invested and incubated by Xiaomi, and are experts in their fields. Lumi may disclose your personal data to Xiaomi or other Mi Ecosystem companies so as to provide you with and improve the exciting products and services (both hardware and software) from the Mi Ecosystem. Some of these products and services will still be under Xiaomi / Mijia / Mitu brands, while others may use our own brand. Lumi will take appropriate organizational and technical measures to ensure the security of personal data during the process of sharing of information, including but not limited to the encryption of your personal data.

MERGER, SALE, OR OTHER ASSET TRANSFERS

If Lumi is involved in a merger, acquisition or asset sale of all or a portion of our assets, you will be notified via email and/or a prominent notice on our website, of any changes in ownership, uses of your personal information, and choices you may have regarding your personal information. Lumi will endeavor to direct the transferee to use personal information in a manner that is consistent with the Privacy Policy in effect at the time such personal information was collected.

DISCLOSURES AS REQUIRED BY LAW AND SIMILAR

Lumi may access, preserve, and disclose your personal information and other account information if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) respond to your requests; (iii) protect yours', ours' or others' rights, property, or safety; (iv) to enforce our policies or contracts; (v) to collect amounts owed to us; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.

INFORMATION NOT REQUIRING CONSENT

We may share anonymized information and statistics in aggregate form with third parties for business purposes, for example with advertisers on our website, we may share them trends about the general use of our services, such as the number of customers in certain demographic groups who purchased certain products or who carried out certain transactions.

For the avoidance of doubt, Lumi may collect, use or disclose your personal information without your consent if it is and only to the extent it is allowed explicitly under local data protection laws. Such disclosure may be brought about by the necessity to protect our rights, ensure the safety of you and other people, and comply with the requirements of the local government to facilitate the investigations of illegal activities.

SECURITY SAFEGUARDS

LUMI'S SECURITY MEASURES

We are committed to ensuring that your personal information is secure. We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure, and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

In order to prevent unauthorized access, disclosure or other similar risks, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we collect from your using of Lumi products and services and on Lumi websites.

For example, when you access your Mi Account, you can choose to use our two-step verification process for better security. When you send or receive data from your Lumi device to our servers, we make sure they are encrypted using Secure Sockets Layer ("SSL") and other algorithms.

All your personal information is stored on secure servers that are protected in controlled facilities. We classify your data based on importance and sensitivity, and ensure that your personal information has the highest security level. We make sure that our employees and Third Party Service Providers who access the information to help provide you with our products and services are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet such obligations. We have special access controls for cloud based data storage as well. All in all, we regularly review our information collection, storage and processing practices, including physical security measures, to guard against any unauthorized access and use.

By using our products and services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the site or through the product or service and/or by sending an e-mail to you. You may have a legal right to receive this notice in writing.

WHAT YOU CAN DO

- You can play your part in safeguarding your personal information by not disclosing your login password or account information to anybody unless such person is duly authorized by you. Whenever you log in as a Mi Account user, particularly on somebody else's computer or on public Internet terminals, you should always log out at the end of your session.
- Lumi cannot be held responsible for lapses in security caused by third party accesses to your personal information as a result of your failure to keep your personal information private. Notwithstanding the foregoing, you must notify us immediately if there is any unauthorized use of your account by any other Internet user or any other breach of security.
- Your assistance will help us protect the privacy of your personal information.

OPT-OUT (RIGHT TO RESTRICT PROCESSING)

You have the right to opt out of certain uses and disclosures of your personal information. Where you have consented to Lumi's processing of your personal information, you may withdraw that consent at any time and opt-out to further processing by sending email to privacy@lumiunited.com. In order to provide our services to you, we will ask you to provide personal information that is necessary to provide those services to you. If you do not provide your personal information, we may not be able to provide you with our products or services.

- **Email and Telephone Communications**
  If you receive an unwanted email from us, you can email us at privacy@lumiunited.com to opt-out of receiving future emails. We will process your request within a reasonable time after receipt. We may also send you certain non-promotional communications regarding Lumi and our products and services, and you will not be able to opt out of those communications (e.g., communications regarding updates to this Privacy Policy).
- **Mobile devices**
  Lumi may send you push notifications through our mobile applications that may be of interest to you. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device.

RETENTION POLICY

Personal information will be held for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. We shall cease to retain personal information, or remove the means by which the personal information can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal information was collected is no longer being served by retention of the personal information. If further processing is for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes according to the applicable laws, the data can be further retained by Lumi even if the further processing is incompatible with original purposes.

All the personal information on the device will be erased when you reset your device to factory default settings. To implement this, for control hub, you can press the button on the hub 10 times until hearing “reset successfully” to delete all local user data. Beware that factory settings can’t be undone, so you have to make sure that you don’t need the information any more.

ACCESSING OTHER FEATURES ON YOUR DEVICE

Our applications may need access to certain features on your device such as Wi-Fi network status. This information is used to allow the applications to run on your device and allow you to interact with the applications. At any time you may revoke your permissions by turning these off at the device level or contacting us at privacy@lumiunited.com.

YOU HAVE CONTROL OVER YOUR INFORMATION!

CONTROLLING SETTINGS

Lumi recognizes that privacy concerns differ from person to person. Therefore, we provide examples of ways Lumi makes available for you to choose to restrict the collection, use, disclosure or processing of your personal information and control your privacy settings:

- Log in and out of the Mi Account
- Bind/unbind device;

If you have previously agreed to us using your personal information for the above mentioned purposes, you may change your mind at any time by writing or emailing us at privacy@lumiunited.com.

ACCESS, UPDATING, CORRECTING OR ERASURE YOUR PERSONAL INFORMATION

- You have the right to request access to and/or correction of any other personal information that we hold about you. When you update your personal information, you will be asked to verify your identity before we proceed with your request. Once we obtain sufficient information to accommodate your request for access to or correction of your personal information, we shall proceed to respond to your request within any timeframe set out under your applicable data protection laws.
- A copy of your personal data collected and processed by us will be provided to you upon your request free of charge. For any extra request of the same information, we may charge a reasonable fee based on actual administrative costs according to the applicable laws.
- If you would like to request access to your personal data held by us or if you believe any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the email address below.
  Email: privacy@lumiunited.com.
  If you are Europe Union user under General Data Protection Regulation (GDPR), you have the right to obtain from us the erasure of your personal information. We shall consider the grounds regarding your erasure request and take reasonable steps, including technical measures, if the grounds apply to GDPR.
- If you are Europe Union user under GDPR, you have the right to obtain from us the restriction of processing your personal information. We shall consider the grounds regarding your restriction request. If the grounds apply to GDPR, we shall only process your personal information under applicable circumstances in GDPR and inform you before the restriction of processing is lifted.
- If you are Europe Union user under GDPR, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- If you are Europe Union user under GDPR, you have the right to receive your personal information in a structured, commonly used format and transmit the information to another data controller.
- Although Lumi makes good faith efforts to provide individuals with access to their personal information, there may be circumstances in which Lumi is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate

rights, where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question or where it is commercially proprietary. If Lumi determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Lumi will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal information.

WITHDRAWAL OF CONSENT

You may withdraw your consent for the collection, use and/or disclosure of your personal information in our possession or control by submitting a request. This may be done by sending e-mail to privacy@lumiunited.com. We will process your request within a reasonable time from when the request was made, and thereafter not collect, use and/or disclose your personal information as per your request.

Please recognize that your withdrawal of consent could result in certain legal consequences. Depending on the extent of your withdrawal of consent for us to process your personal information, it may mean that you will not be able to enjoy Aqara Hub M1S products and services.

TRANSFER OF PERSONAL INFORMATION OUTSIDE OF YOUR JURISDICTION

To the extent that we may need to transfer personal information outside of your jurisdiction, we shall do so in accordance with the applicable laws. In particular, we will ensure that all transfers will be in accordance with requirements under your applicable local data protection laws by putting in place appropriate safeguards. You will have the right to be informed of the appropriate safeguards taken by Lumi for this transfer of your personal information

Lumi may use overseas facilities to process or back up your personal information. Currently, Lumi has data centers in China, Germany, India, Russia, Singapore and United States. These overseas jurisdictions may or may not have in place data protection laws which are substantially similar to that in your home jurisdiction. We may transfer to and store your personal information at our overseas facilities. However, this does not change any of our commitments to safeguard your personal information in accordance with this Privacy Policy. Your personal information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to Lumi, you consent to the storage of your personal information in these locations.

MISCELLANEOUS

MINORS/CHILDREN'S PRIVACY

We consider it the responsibility of parents to monitor their children's use of our products and services. Our products and services are not directed to children under 13 (and in certain jurisdictions under the age of 16) years of age, and Lumi does not knowingly collect personally identifiable information from children. If you are a child under 13 (and in certain jurisdictions under the age of 16), you must have your parent's permission to access the products and services. Lumi urges parents to instruct their children never to give out their real names, addresses, or phone numbers, without parental permission, when online.

It is our policy not to require personal information from minors or offer to send any promotional materials to persons in that category. Lumi does not seek or intend to seek to receive any personal information from minors. Should a parent or guardian have reasons to believe that a minor has provided Lumi with personal information without their prior consent, please contact us to ensure that the personal information is removed and the minor unsubscribes from any of the applicable Lumi services. If we learn that we have collected any personal information from children under 13 (and in certain jurisdictions under the age of 16) without obtaining permission from a parent, we will promptly take steps to delete such information and terminate the minor's account.

ORDER OF PRECEDENCE

If you have agreed to our applicable User Agreements, in the event of inconsistency between such User Agreements and this Privacy Policy, such User Agreements shall prevail.

UPDATES TO THE PRIVACY POLICY

We keep our Privacy Policy under regular review and may update this privacy policy to reflect changes to our information practices. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the products or services after the updated Privacy Policy is posted. If, at any point, you do not agree to any portion of the Privacy Policy then in effect, you must immediately stop using the products and services. If we make material changes to our Privacy Policy, we will notify you by email (sent to the e-mail address specified in your account) or post the changes on all the Lumi websites or through our software, so that you may be aware of the information we collect and how we use it. Such changes to our Privacy Policy shall apply from the effective date as set out in the notice or on the website. We

encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of products and services on the websites, mobile phones and/or any other device will be taken as acceptance of the updated Privacy Policy. We will seek your fresh consent before we collect more personal information from you or when we wish to use or disclose your personal information for new purposes. Before we use personal information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt-out.

DO I HAVE TO AGREE TO ANY THIRD PARTY TERMS AND CONDITIONS?

Our Privacy Policy does not apply to products and services offered by a third party. Lumi products and services may include third parties' products, services and links to third parties' websites. When you use such products or services, they may collect your information too. For this reason, we strongly suggest that you read the third party's privacy policy as you have taken time to read ours. We are not responsible for and cannot control how third parties use personal information which they collect from you. Our Privacy Policy does not apply to other sites linked from our services.

OUR APPROACH TO MANAGE YOUR PERSONAL INFORMATION UNDER GDPR

If you are Europe Union user under GDPR, Lumi will provide systematic approach to manage personal data deeply engages our people, management processes and information systems by applying a risk management methodology. According to the GDPR, for instance, (1) Lumi set up a Data Protection Officer (DPO) in charge the data protection, and the contact of DPO is dpo@lumiunited.com; (2) Lumi designate a representative (professional attorney of experience we designated) in Europe, and the contact of representative is representative@lumiunited.com (3) procedure like data protection impact assessment (DPIA).

CONTACT US

If you have any comments or questions about this Privacy Policy or any questions relating to Lumi's collection, use or disclosure of your personal information, please contact us at the address below referencing "Privacy Policy":

Lumi United Technology Co., Ltd
8th Floor 801-806, Jinqi Zhigu Building, Liuxian Street, Nanshan, Shenzhen, China
Email: privacy@lumiunited.com

Thank you for taking the time to understand our Privacy Policy!