PRIVACY POLICY

Update!

Our Privacy Policy was updated on **Sep 1, 2021**. This Privacy Policy can provide details on how we manage your personal information when you use 【Aqara Hub M1S 2022】 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") collects, uses, discloses, processes and protects any personal information that you give us when you use our products and services. Should we ask you to provide certain information by which you can be identified when using Lumi 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 to 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 our 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 (if any). 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):

- **Account information.** We may collect information related to your account, including your Account nickname, profile photo, shared Account, phone number (if any), e-mail address.
- **Device information.** We may collect and use information related to your device, including device name, manufacturer, 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,device ID, firmware version, plug-in version, chip temperature,sub-device list information, device guard status, night light on/off, and ambient illumination information.
- **Device usage information:**We may collect location management information of installation and use of the device (including the name of the router, the location of the room) , Device guard settings (guard on/off, effective time of guard delay, alarm log, alarm trigger device, alarm ringtone and volume, alarm duration, red light flashing settings, automatic alarm settings), night light settings (night light brightness&color, night light trigger device settings, night light sensing period, delay time of turning off light), security password settings, user automation scene settings and execution logs.

- **Network information.** We may collect information related to your network, like Wi-Fi information, device IP, and MAC address,online or offline status of Zigbee sub-device network connection, wifi signal information.

- **Automation settings information.** We may collect information related to your Automation setting, like automation name, automation execution logs, condition and action list, effective time period setting, execution result notification setting, settings that enable or disable automation.
- **Feedback information.** We may collect the feedback information that you provide, including feedback content (including product usage or quality problems) , router model, basic contact information and error logs.
- **Aqara Hub M1S 2022 (Control Hub).** Including: night light on/off, color, brightness data; alarm timing setting data, alarm trigger device list information, alarm delay effective time, Hub alarm ring tone list information, alarm volume, alarm red light flashing duration, linkage alarm list data, alarm messages and logs; Hub language， Hub volume； automatic night light settings; timed color light settings; sub-device list information.

You can use the app to connect to the sub-devices or triple press the Hub button to add the sub-devices. In order to ensure the smooth operation of the device and provide you with device services, after the device connects to the app or hub, it means that you agree to the information collected by the device, and we will collect data about the device.

HOW THE PERSONAL INFORMATION IS USED

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.
- Analysis and development of statistical information related to the use of our products and services that are used to further improve our products and services.
- Storing and maintaining information related to you for our business operations (such as business statistics) or for fulfilling our legal obligations.

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

1. We may use your account information to create an Account for you, to query the devices bound to the account and ensure that whenever the device is accessed, it is authorized.
2. We may use the device information to provide the corresponding device functions for you, such as to provide you with low battery alert notifications and device failure notifications, or to provide you a shortcut to control the device quickly. And we also use such information to calculate the number of activated

devices and the number of devices connected, analyze the firmware version and push firmware update notifications.

3. 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 precise geographic location information.
4. We may use Automation settings information to provide you with smart automation scenes. Automation requires you to set up scenes on your own. 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.
5. We may collect feedback information to help us analyze and resolve feedback issues and contact you in a timely manner to inform you of the solution to your problem.
6. We may use the data related to Hub 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.

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. If you no longer wish to allow us sharing this information, please contact us at privacy@lumiunited.com.

To help us provide you with services described in this Privacy Policy, we may, where necessary, share your personal information with our third party service providers listed in this section below. These third party service providers may process your personal information on Lumi's behalf or for one or more of the purposes of this Privacy Policy. 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.

INFORMATION NOT REQUIRING CONSENT

Lumi may disclose your personal information to others without further consent when it is required by law.

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. 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. We will use all reasonable efforts to safeguard your personal information.

For example, when you access your Aqara Account, you can choose to use authorization code 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.

We ensure that the personal data, which we store on the local server, will not be directly transmitted back to mainland China without data desensitization to protect the security of the user's personal data.

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 an Aqara 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.

RETENTION POLICY

Personal information will be held for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws. We will cease to retain and delete or anonymize 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 hub, you can press the button on the hub 10 times to delete all local user data; for light bulb, you can fast turn on/off bulb 5 times to delete all local user data, and for other sub-devices, you can press and hold the reset button for 10 seconds 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

YOUR RIGHTS

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 Account
- Agree/disagree when window of privacy is pop up;

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.

YOUR RIGHTS TO YOUR INFORMAION: ACCESS, UPDATING, CORRECTING OR ERASURE

- 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 time frame set out under your applicable data protection laws.
- Based on the requirements of applicable 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
- Based on the requirements of applicable laws, you may have the right to request the deletion, erasure or removal of your personal information where there is no compelling reason for us to keep using it. We shall consider the grounds regarding your erasure request and take reasonable steps, including technical measures. If the right is upheld, we may not be able to immediately

remove the information from the backup system due to applicable legal and security technologies. If this is the case, we will securely store your personal information and isolate it from any further processing until the backup can be cleared or be made anonymous.

- 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. The withdrawal of your consent or authorization will not affect the validity of our processing carried out on the basis of the consent up until the point of withdrawal.

Please recognize that your withdrawal of consent could result in certain 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 and its sub-device products and services.

MISCELLANEOUS

MINORS/CHILDREN'S PRIVACY

We consider it the responsibility of parents to monitor their children's use of our products and services. Lumi does not knowingly collect personally identifiable information from children.
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.

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. 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 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 consent from you again before we collect more personal information from you or when we wish to use or disclose your personal information for new purposes.

User complaint channel and feedback mechanism

If you have any questions, comments or suggestions on this privacy policy, or have any comments or suggestions on the collection, use, sharing, access, deletion, correction and other related matters of your personal information, or you think your personal information rights may be infringed, or you encounter any problems while using the services provided by Lumi, you can contact us or file a complaint by clicking "Profile"-"Help and Feedback" in the app, or the contact information stated in this Privacy Policy. In some cases, to protect the security of your personal information, we may require you to provide a written request or prove your identity by other means. We will respond to your request within 15 working days after receiving your feedback and verifying your identity.

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!