

# GE LIGHTING, A SAVANT COMPANY PRIVACY POLICY

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## Copyright Notice

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**Savant Technologies LLC** (“**Lighting**”, “**we**”, “**us**”, or “**our**”) respects the privacy of our users. This Privacy Policy explains the type of personal information that we collect and how we collect, use, access, disclose, safeguard, store and otherwise process your personal information, also known as personal data (i.e. any information that personally identifies you such as your name and contact information), when you use the Lighting family of smart home products and services including, but not limited to, Lighting, Climate, Energy Monitoring & Management, Audio, Video, Security, Entry Access, and other services from Lighting, as well as any products which may include embedded software (“**Product Software**”, and together with the purchased hardware product will be referred to as “**Products**” herein), related software applications, including any mobile software application, known as the Cync Application (“**Cync**”, or “**App**”), the related Lighting Website Application (“**WebApp**”), use of our websites (“**Site**”), including subscription services available through our Site, the App and WebApp (“**Subscription Services**”). The Site, App, WebApp and Subscription Services are the “**Services**” and together with the Products, the “**Lighting System**”.

Please read this Privacy Policy carefully. If you do not agree with the terms of this Privacy Policy, please do not access or use the Lighting System. Your clicking to accept these terms in our App or WebApp or use of the Lighting System is your acknowledgement and agreement (i) to the terms of our Privacy Policy and any other applicable agreement that may be provided together with the Products and Services, and (ii) that we have your permission to collect and process your information as described in this Privacy Policy.

We may need to make changes to this Privacy Policy as privacy laws change, our Services evolve, or we add or change service providers among other things. As a result, we reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. We will also attempt to notify you via email or through the App or WebApp should a material change occur. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on our website at [www.gelighting.com](http://www.gelighting.com), and you waive the right to receive specific notice of each such change or modification. Your continued use of the Lighting System following the posting of changes to these terms means you accept the updated Privacy Policy.

You are solely responsible for ensuring that you comply with all applicable laws when you use the Lighting System.

## INFORMATION WE COLLECT

### 1) Information we may collect directly from you:

- Personal Information that identifies you, such as your name, contact details including phone number, email address, postal address, telephone or fax number; area code only, zip code only, ID information such as driver’s license number or SSN, dependents, spousal and other family information, and household information;
- Account Registration Information, such as information provided by you when you register for an account to use your Lighting System, including User ID, log-in details, security questions and answers, and passwords;

- Product Set-Up Information, such as the name, description and location of Products you have registered;
- Financial, Payment and Commercial Data, such as name, billing address and payment card details, including credit card numbers, expiration dates, and security codes (which are collected by our third party payment processor on our behalf) in the event you purchase any Services directly from us as well as any history and records of Products and Services inquired about, obtained or other purchase information (refunds, returns or exchanges);
- Sensitive Data and Biometric Information, such as health and medical information, including but not limited to, disability status or biometric Information such as facial recognition or voice ID you upload as part of the Services;
- Audiovisual Materials, such as photographs, images and recordings that you upload to identify users or otherwise as part of your use of the Lighting System;
- Professional or Employment related information you provide, such as your current position, job title, employer, or location, that you may provide in relation to the Services;
- Export Control Information, such as your nationality or country of residence, that allows us to determine if you are permitted to receive certain information or technologies pursuant to export control regulations;
- Marketing and Communications Data, including your marketing preferences or your interest in our Products and Services, and your subscriptions to our Services; and,
- Other personal information you submit to us through communications, customer support exchanges, our “Contact Us” link, surveys, a competition, reporting a problem, email, or otherwise.

2) Information we may obtain about you from your usage, from others or by automated means:

- Information We Obtain from Third Party Business Partners; such as personal contact details, account registration, or Products information provided by an authorized Lighting distributor or installer;
- Biometric Information including Facial Recognition, footage recorded from your use of the Lighting System, such as facial recognition or voice identification of you, your family, or any person in or outside your home that is captured by the Lighting System;
- Video, Audio and Other Data, such as video or audio streams, images, preferences, usage data, comments, performance metrics, and data collected by the Lighting System during the performance of any Products or Services, and their respective functions including motion detection, audio detection, video recordings, event logging or recording, temperature, and lighting;
- Derivative Data, such as technical information about the Products or Services, including device name and type, IP address, Wi-Fi network information and signal strength, other set up data, sensor status, adjustments to Products, usage, battery charge level, operating system, browser type, access times, pages viewed directly before and after accessing the App or Web App, other interactions with the application which are automatically collected and stored in log files;
- Data from Social Media Sites, such as items, comments, feedback or content posted on our social media pages;
- Geolocation and GPS Data, including physical location of your Products, such as device(s) data or collection of audio by using satellite, cell phone tower, or Wi-Fi signals;
- Audiovisual Materials, such as other audio, video captured during marketing/public filming events that you consented to including recording of virtual or live workshops or similar events;
- Information We Obtain from Third Party Social Media Services, such as Facebook if you choose to link to, create or log into your Lighting account through these third party services (including when you share Lighting videos, or content via your social media account) or payment services;

- Information We Collect from Publicly Available Sources, including registers, the internet, public authorities, previous employers, educational institutions, suppliers and vendors without obligations of confidentiality;
- Market and Research Information, such as IP address, social media handle, or other online identifiers of a person, email address/mobile number if used for direct marketing and name and address, demographic data, (e.g., income, family status, age bracket, gender, interests, pets, home ownership, health, current service providers); and
- Cookies, web server logs, web beacons and other technologies (See also our Cookies Notice).

### What types of information does the Lighting System collect, save and share in general?

- Set up information for the particular Product
- Sensor data from Products
- Adjustment to Products
- Usage and performance data
- Technical information
- Saved and shared content
- Biometric data, including facial recognition, in certain cases
- Video, audio, recordings, and associated data

With respect to your use of any camera that is part of the Lighting System, we may also collect sensitive information (personal data that has special protection under data protection laws) about you. For example, we may collect biometric data in order to provide a facial recognition functionality for an Authorized User, family member, third party you upload, or other visitors at your residence, property or business.

**You can disable the processing of biometric data at any time by managing your settings directly from the Lighting System.** Our cameras are strictly for personal or domestic use. The Lighting System and associated cameras allow you to determine the purposes and means of the processing activities you want to achieve in your home. In certain jurisdictions, the rights of individuals under camera surveillance are protective of such individuals being recorded. Your sharing of such videos in the public domain or surveilling public space with your camera may make additional laws applicable to your surveillance. In any case, you are responsible for compliance with any applicable law when using our Products and Services. It is your responsibility to understand the law that applies to your collection and use of facial recognition, video, audio and other data where you live.

For example, certain laws or regulations require that you inform anyone entering your property or home about the functioning and operation of the cameras. If necessary, depending on applicable law and your processing activities, you may either need to display a notice alerting visitors to your property or home that you are using a camera to record images and people on your property, and, in some cases, you may need to obtain their prior explicit consent. We cannot be responsible and will not be responsible for your compliance with applicable laws from the use of the Lighting System, and it is your responsibility to understand the law that applies to you and where required obtain explicit consent for the collection of biometric information including, e.g., facial recognition, of other users or visitors to your home, invited or uninvited, inside or outside your home. You are required to comply with all applicable legislation regarding the protection of personal information, image rights and privacy.

### HOW WE USE THE INFORMATION WE COLLECT

We use your personal and other information to:

- Manage our contractual relationship with you, including providing you with information regarding your Products and Services, billing and order information, purchased Products, handling claims, troubleshooting, system maintenance, hosting and providing customer support services;
- Set up and manage your Lighting account and profile; including to maintain your subscription to any Services and contact you regarding your account;
- Provide, develop and improve our Products and Services to you, including delivering our Services to you and for additional purposes that help us to develop and improve the quality of our Products and Services (including as part of the development of any new products and services);
- Facilitate communication; between us as well as the Lighting authorized distributor that installs your Lighting System;
- Comply with a legal, regulatory or relevant industry standard obligation; including this Privacy Policy, intellectual property infringement, or enforcing our Terms of Service, Support Agreement, or other contracts you have entered into with us;
- Protect against, identify and prevent fraud or other criminal activity, claims and other liabilities, that we may notice based upon any activity on your account or your use of the Services;
- Monitor your use of the Lighting System, as part of any routine support and maintenance of the Products or included in any subscription Services, provided you understand Lighting is not obligated to monitor your use of the Lighting System;
- Improve the security and other related system and network functions including preventing misuse;
- Perform analytics, including trend and financial analysis, market and consumer research, anonymization and aggregation of personal information; and
- Conduct marketing activities in accordance with applicable laws. Depending on your jurisdiction, you will either be required to opt in to receive marketing communications or opt out by using the unsubscribe link in any marketing materials you receive via email from us or by contacting us at the link provided on our website.

## HOW WE SHARE YOUR INFORMATION

1) We share your personal information in the following limited situations with:

- Affiliates, other Savant companies that comply with this Privacy Policy;
- Authorized Users, that you invite;
- Third Party Business Partners, that you contracted with such as an authorized distributor or installer;
- Third Party Advertisers, for marketing purposes from which you can opt out at any time;
- Third Party Providers Products or Services that you select to integrate or interoperate with the Lighting System, only where you have directed us to connect you with such third party and you have consented to their access or control of the Products or Services that you have connected, such as Google Home, Amazon Alexa, or other third party providers whereby such third party providers have own terms and conditions and privacy policies which will govern your use of their products and services and their use of your personal information;
- Our Service Providers, who provide some of our Services to you including processing, storage, and technical assistance whereby we have entered into contracts with such service providers which include limitations on their use of certain of your information and only as necessary to provide these Services to us/you;
- Third Party Service Providers for Web and App Analytics, including automated technology to collect and analyze your information, including personal information to help us understand your use and optimize your customer experience (please see our section on Cookies and our separate Cookie Notice to learn more);
- Professional Advisors and Governmental Authorities, if we believe in good faith that disclosure, access, use or preservation of such information is necessary to (i) meet any applicable law,

regulation, legal process or governmental request; (ii) enforce or investigate your compliance with the terms of any of our contracts or policies we have with you for potential violations; (iii) protect against physical, financial or other harm against the rights, safety or property of you, us, or any third party; and, (iv) investigate fraud, technical, security or other operational issues; and

- In connection with Corporate Transactions, meaning changes to our corporate structure due to sale, transfer, merger or other reorganization of our company during which your personal information may be among the items sold or transferred.

2) We may share your non-personal information with:

- Affiliates,
- Third Party Business Partners, and
- Other Users, including aggregated or anonymized customer data related to, for example, energy use and consumption, to help us improve our System or raise awareness about safety issues.

**Note:** Our Privacy Policy does not cover any information that you provide to a third party, Lighting distributors that you purchase a Lighting Product from or from an installer for the installation of the Lighting System. Their use of your personal information will be covered by their respective privacy policy.

Any data that Lighting receives from third parties will be processed and stored by Lighting in accordance with the terms of this Privacy Policy.

## HOW WE SECURE YOUR INFORMATION

The security of your information is important to us. We practice industry standard security methods including building defense in depth in our Services to address appropriate technical, administrative, electronic, and organizational safeguards to protect your information from unauthorized use, disclosure, and loss. Encryption technology, including current industry-standard encryption protocols, is used to protect personal information. We also use a variety of physical and infrastructure protection measures that comply with applicable regulations to protect and store your personal information. However, despite our efforts to secure your information, we cannot be responsible for the security of the information you transmit over networks that we do not control including the Internet and wireless networks whether they are yours or others.

## WHERE YOUR PERSONAL INFORMATION IS USED OR ACCESSIBLE INCLUDING ANY INTERNATIONAL TRANSFERS

Lighting is located in the United States, and as such, certain personal information will be accessed and stored there, and will be transferred there should you live in another country. Lighting may also contract with cloud service providers located in other countries, and certain personal information may be accessed and stored from additional countries. Where required, we have put in place appropriate safeguards with our affiliates, service providers, contractors, distributors and other business partners and agents to manage transfers of personal information in a manner that addresses security protocols.

## RETENTION OF YOUR PERSONAL DATA

We retain your personal information as follows:

The period during which we store your personal information varies depending on the purpose for the processing:

- For the provision of our Products and Services, for so long as you are a client or subscriber to the Services.
- For marketing purposes, until you have opted out of receiving further direct marketing communications in accordance with applicable law.
- In all other cases, we store your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy or such retention period as required by law, following which time it is either anonymized (where permitted by applicable law), deleted or destroyed.

The applicable information, and location and infrastructure where your personal information is stored or can be accessed is as follows:

- Product, in your home, information including but not limited to photos, videos, audio, email address, Wi-Fi or network password, account profile information, with such information being stored until you delete it from or reset your Product,
- Within Lighting's infrastructure, such as on our or our service provider's servers or cloud environment, where we may store your personal information including but not limited to photos, videos, audio, email address, Wi-Fi or network password, account profile information, until you delete it, edit it, or for as long as you remain a client or for such period for us to meet a legitimate interest, resolve dispute, legal defense, enforce agreements, conduct audits and comply with laws. Further, you can request that we provide you with access, amend or delete your information on our servers in certain cases.

## USE OF COOKIES AND OTHER DATA COLLECTION TOOLS

Cookies are small text files placed on a user's computer or smartphone and are commonly used to collect personal information. Cookies are sent to your browser from a website and stored on your device. To enable our systems to recognize your browser or device and to provide and improve the Services, we use cookies and other data collection tools and similar technologies, such as pixels. These data collection tools measure and track customers' visits to and browsing activities as part of the Services and to compile sales and statistical data.

For example, beacons let us know when a purchase is made on one of our websites by a member of one of our third-party affinity or affiliate programs and when a purchase is initiated by an advertisement that we placed on a third party's website. This information assists us in marketing and managing our Services and enhancing your shopping experience. For more information about cookies and how we use them, please read our Cookie Notice.

## WEB BROWSER SETTINGS

You can opt out of our use of cookies to recall information about you by setting your browser not to accept cookies or to disable cookies. Most browsers also offer additional built-in tools to help you manage, control, and delete cookies, including cookies used for advertising.

We support the development and implementation of a standard "do not track" browser feature that provides customers with control over the collection and use of information about their web-browsing activities. Once a standardized "do not track" feature is released, we intend to adhere to the browser settings accordingly.

## MINORS

You must be at least 18 years old (or equivalent minimum age in the jurisdiction where you reside) to use the Products and Services. If you are between the ages of 13 (or equivalent minimum age in the jurisdiction where you reside) and 17, you may use our Products and Services only with the consent and under the supervision of a parent or legal guardian who agrees to be bound by this Privacy Policy on your behalf. If you are a parent or legal guardian of a user between the ages of 13 and 17 (inclusive), you consent to the provisions of this Privacy Policy on behalf of such user and you are fully responsible for the acts of such user in relation to our Products and Services. If you're agreeing to this Privacy Policy on behalf of an organization or entity, you represent and warrant that you are authorized to agree to this Privacy Policy on behalf of that organization or entity and to bind them to these provisions (in which case, the references to "you" and "your" in this Privacy Policy, except for in this sentence, refer collectively to you personally and to that organization or entity). Any use or access to the Products and Services by individuals under the age of 13 (or the equivalent minimum age in the jurisdiction where you reside) is strictly prohibited and is a violation of this Privacy Policy.

## CONTACT US

If you have any questions about this Privacy Policy or if you would like us to update information we have about you, change your preferences, or exercise applicable data protection rights, please contact us at: <https://www.gelighting.com/contact>, call us at 1-844-302-2943 or write to us at: Nela Park, 1975 Noble Road, East Cleveland, Ohio 44112-6300, Attn: Legal Department.

## Privacy Policy for California Residents

Last updated: June 2022

This **PRIVACY POLICY FOR CALIFORNIA RESIDENTS** (“California Privacy Policy”) supplements the information contained in the Lighting’s Privacy Policy and applies solely to California residents who visit Lighting’s website, or use the Lighting System. This California Privacy Policy describes the personal information that Lighting collects about you, the rights you have with respect to that information, and how you can exercise those rights. Lighting adopts the California Privacy Policy to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and the California Online Privacy Protection Act (“CalOPPA”) and any terms defined in the CCPA and CalOPPA have the same meaning as used herein. In this California Privacy Policy, “we,” “us,” and “our” refer to Lighting and “you” and “your” refer to you, an individual.

Lighting values the privacy of our clients and we take measures to implement reasonable security controls for the protection of our clients’ information. California law and more specifically CCPA define ‘personal information’ very broadly as information that relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. It could include identifiers such as IP addresses or device identifiers, in addition to names and addresses. This California Privacy Policy provides additional information regarding Lighting’s practices and your rights if you are a resident of California.

### Information We Collect

Please see the section above entitled Information We Collect

### Use of Personal Information

Please see the section above entitled How We Use Your Information

### Sharing Personal Information

We may disclose your personal information to a third-party for a business purpose and for other reasons as permitted by law. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- To our affiliate partners when you access the documents, products or programs available as part of the Services.
- To our affiliate entities and subsidiaries for the purposes described in this California Privacy Policy.
- To a third party in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- To other persons or entities where you consent to the disclosure.

We may also disclose your personal information to comply with laws, legal processes and law enforcement to the following categories of third parties:



- To government, law enforcement officials, regulators and others as we believe is necessary or appropriate to respond to claims and legal processes (including subpoenas and administrative summonses), to protect the property and rights of Lighting or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be illegal, unethical or legally actionable.

In the preceding twelve (12) months, we have disclosed the following categories of personal information:

- Identifiers
- California customer records personal information categories
- Protected classification characteristics under California or federal law
- Commercial information
- Internet or other similar network activity
- Geolocation data

In addition, we may disclose personal information for other purposes, including with companies we work with to help us market or advertise to you. And while we do not sell your personal information for money, we do disclose your personal information to third parties as described in this Privacy Policy, and such disclosure could be in a manner that CCPA construes as a "sale." The concept of a "sale" under CCPA is different from what has traditionally been considered a "sale", e.g., selling a customer list for money. Under CCPA, a "sale" potentially includes other uses or disclosures of personal information to third parties outside Lighting in a commercial context where an exception to "sale," as provided by CCPA, does not exist. Because the concept of "sale" is arguably so broad under CCPA, Lighting may conceivably be deemed to "sell" personal information, even if such "sales" are not the exchange of that personal information for money. Lighting does not knowingly 'sell' any personal information of minors under the age of 18. Should you wish to opt out of Lighting sharing any personal information in this capacity, please contact us.

## **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### **Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about what personal information we collect, use, disclose and sell. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we have collected about you in the last 12 months, why we have collected it, and whether we have disclosed that information for a business purpose.
- The categories of sources from which we collect personal information.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

### **Deletion Rights Requests**

You have the right to request that we delete your personal information we collected from you, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and

direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Exercising Access, Data Portability and Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Contacting us at: <https://www.gelighting.com/contact>,
- Calling us at 1-844-302-2943, or
- Writing us at: Nela Park, 1975 Noble Road, East Cleveland, Ohio 44112-6300, Attn: Legal Department.

Only you or a person that you authorize to submit a request to know your personal information or to delete your personal information on your behalf, may make a verifiable consumer request related to your personal information. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If you submit a request to know or delete personal information, we will verify your identity. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 30 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to the registered email associated with the account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **Right to Opt-out of the Sale of Your Personal Information**

Where a business sells your personal information, you have the right to opt-out of the sale of that personal information. In the preceding twelve (12) months, Lighting has not sold and does not sell your personal information for money; however, Lighting has shared your personal information as outlined in this Privacy Policy. If you would like Lighting to stop sharing your personal information, please contact us, or select this option as part of the cookie banner that can be found on the website.

## **Non-Discrimination**

You have the right not to receive discriminatory treatment by us because you have exercised your privacy rights. This means that you have the right not to be denied goods or services, charged different prices, or provided a different level or quality of Services, just because you have exercised your privacy rights.

## **Correction of Information Collected from You Online**

CalOPPA provides you with the right to correct the information that we collected about you online. If you entered information online and later need to correct that information, please contact us at <https://www.gelighting.com/contact>. Please note that if we cannot associate the information to you, we may not be able to correct it.

## **Changes to Our Privacy Policy**

We reserve the right to amend this California Privacy Policy at our discretion and at any time. If we materially change this California Privacy Policy, we will post the updated notice on our Services and update the notice's effective date. Your continued use of our Services following the posting of changes constitutes your acceptance of such changes. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contact Information**

If you have any questions or comments about this California Privacy Policy, the ways in which we collect and use your personal information, your choices and rights regarding such collection or use, or wish to exercise your rights under California law, you may contact us at: <https://www.gelighting.com/contact>, calling us at 1-844-302-2943 or writing to us at: Nela Park, 1975 Noble Road, East Cleveland, Ohio 44112-6300, Attn: Legal Department.