

G.Smart Privacy Policy

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G.Smart (Garen Automação S / A) is committed to protecting your privacy. This Privacy Statement (“Statement”) describes our practices related to the privacy of the information in the Personal Data that we process through the individual use of the following related services, products and mobile applications (collectively, the “Products”):

- G.Smart Mobile App

In this Privacy Notice, “Personal Data” means information that can be used to identify an individual, solely from that information, or from that information and others to which we have access related to that individual. “Smart Devices” refer to those non-standard computing devices, produced or manufactured by hardware manufacturers, with a human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, portable devices smart, etc. “Apps” refer to those mobile apps developed by G.Smart that provide remote control to end users for Smart Devices and with the ability to connect to the Platform.

What personal data we collect

To provide our services to you, we ask you to provide your Personal Data in the necessary manner. If you do not provide your Personal Data, we may not be able to provide our products or services.

1. Information you voluntarily provide to us

- Account or profile data: When you register an account with us, we may collect your contact details, such as your email address, phone number, username and access credentials. During your interaction with our products, we may collect your nickname, profile image, country code, language preference or time zone information in your account.
- Feedback: When using the feedback and suggestion features in our Products, we will collect your email address, mobile phone number and your feedback content to resolve your issues and resolve device failures in a timely manner.

2. Information We Collect Automatically

- Device Information: When you interact with our Product, we automatically collect device information such as your MAC address, IP address, wireless connection information, operating system type and version, application version number, push notification identifier, log files, and mobile network information.
- Usage Data: During your interaction with our Sites and Services, we automatically collect usage data related to visits, clicks, downloads, messages sent / received and other uses of our Sites and Services.
- Registration information: When you use our application, the registration and exception file can be uploaded.
- Location Information: We may collect information about your precise or inaccurate geographic location in real time when you use our specific Products or Services.

3. Related smart device information:

- Basic smart device information: When you connect your Smart Devices to our Products or Services, we may collect basic information about your Smart Devices, such as device name, device ID, online status, activation time, firmware version and information about update.

- Information reported by smart devices: Depending on the different Smart Devices you choose to connect to our Products or Services, we may collect different information reported by your Smart Devices.

Purposes and legal basis for the processing of Personal Data

The purpose for which we may process information about you is as follows:

- Provide you with services: We process your account and profile data, device information, usage data, location information and information related to the Smart Device to provide our products and services that you have ordered or purchased. The legal basis for this processing is to execute our **contract** with you in accordance with our Terms of Use.
- Improve our services: We process your device information, usage data, location information and information related to the Smart Device to ensure the functions and security of our Products, to develop and improve our Products and Services, to analyze the efficiency of our operations and to prevent and track fraudulent data or inappropriate use. The legal basis for this processing is to execute our **contract** with you in accordance with our Terms of Use.
- Communication without marketing objectives: We process your personal data to send important information about the Services, changes to our terms, conditions and policies and / or other administrative information. As this information may be important, you cannot opt out of receiving such communications. The legal basis for this processing is to execute our **contract** with you in accordance with our Terms of Use.
- Communication for marketing purposes: We may process your Personal Data to provide you with marketing and promotional materials for you in our Products and Services. If we do, each communication we send you will contain instructions that will allow you to not receive future communications of that nature. The legal basis for this processing is your **consent**. In addition, if you consent to participate in our lottery, contest or other promotions, we may use your Personal Data to manage such activities.
- Personalization: We can process your account and profile data, usage data, device information to personalize the product design and provide personalized services for you, such as recommending and displaying information and advertisements related to products suitable for you and inviting you to participate in surveys related to the use of our Products. The legal basis for this processing is your **consent**.
- Legal compliance: We may process your personal data as we believe it is necessary or appropriate: (a) comply with applicable laws and regulations; (b) comply with the legal process; (c) to respond to requests from public and government authorities (d) to enforce our terms and conditions; (e) protect our operations, businesses and systems; (f) to protect our rights, privacy, security or property, and / or other users, including you; and (g) allow us to seek available remedies or limit the damage that we may suffer.

With whom do we share Personal Data?

At G.Smart (Garen Automação S / A), we only share Personal Data according to the anticipated ways. We may share your personal data with the following recipients:

- With our third-party service providers that perform certain business-related functions, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer service, e-mail delivery services, mail and other similar services to enable them to provide services to us.
- With our customers and other business partners who provide you, directly or indirectly, with your Mobile Devices and / or networks and systems through which you access and use our Sites and Services.
- With an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all, or any part of our business, assets or shares (including, without limitation, in connection with any bankruptcy or process). In that case, you will be notified by email and / or a prominent notice on our website about any change in ownership,

new incompatible uses of your Personal Data and choices you may have regarding such Personal Data.

- As we believe is necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and governmental authorities, including public and governmental authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, security or property, and/or those of other users, including you; and (g) to allow us to seek available remedies or limit the damage we may suffer.
- With subsidiaries or affiliates within our corporate family, to conduct regular business activities.
- Except with the third parties described above, with third parties only with your consent.

International transfer of collected information

To facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live.

Your rights related to your personal data

We respect your rights and control over your Personal Data. You can exercise any of the following rights:

Through the “Profile - Personal Center” in our Products

You do not need to pay a fee and we aim to respond within 30 days. If you decide to send us an e-mail, in your request, please make clear what information you would like to change, whether you would like to have your Personal Data deleted from our database, or inform us of the limitations you would like to place on our use of Personal Data. Please note that we may ask you to verify your identity before taking additional steps on your order, for security reasons.

Can:

- Request access to the Personal Data that we process about you;
- Request that we correct inaccurate or incomplete Personal Data about you;
- Request the deletion of Personal Data about you;
- Request restrictions, temporarily or permanently, on the processing of some or all Personal Data about you;
- Request the transfer of Personal Data to you or to third parties, where we process the data based on your consent or through a contract and where our processing is automated; and
- Not wanting or refusing our use of Personal Data about you, where our use is based on your consent or our legitimate interests.

Safety

We use commercially reasonable physical, administrative and technical protections to preserve the integrity and security of your Personal Data. G.Smart provides several security strategies to effectively ensure the security of user and device data. As for access to the device, G.Smart's proprietary algorithms are used to ensure data isolation, authentication of access, authorization request. As for data communication, communications using security algorithms and transmission encryption protocols and commercial-level information encryption transmission based on dynamic keys are supported. As for data processing, strict filters and data validation and complete data auditing are applied. As for data storage, all users' confidential information will be securely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you believe that the security of any account you may have with us has been compromised), you must notify us immediately of the problem by sending an email to smart@garen.com.br

Retention of data

We process your personal data for the minimum period necessary for the purposes set out in this Privacy Notice, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period based on the amount, nature and sensitivity of your personal data and, after the retention period has ended, that data will be destroyed. When we are unable to do so for technical reasons, we will ensure that appropriate measures are taken to prevent any further use of your Personal Data.

Changes to this Privacy Policy

We may update this Privacy Policy to reflect changes in our information practices. If we make material changes, we will notify you by email (send to the email address specified in your account) or via a notice in the mobile apps before the change takes effect. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about our practices or this Privacy Policy, please contact us as follows:

Garen Automação S / A

Address: Rua São Paulo, 760, Jardim Araceli, Garça-SP, CEP: 17400-000

Email: smart@garen.com.br