

Data Protection Policy for use of Airdentifier and corresponding Mobile Apps

Status: 05.06.2024

This data protection policy ("Policy") describes the specific personal data that we process and use, the purposes for which we do so and the measures we implement to protect your data.

1. Scope of application and controller

This Policy applies to the data processing when using the Zehnder Airdentifier Device and Zehnder Airdentifier Mobile Apps. Devices and Apps together referred to as "Systems".

Name and address of the company controlling the processed data:

*Zehnder Group International AG («Zehnder»)
Moortalstrasse 1
5722 Gränichen
Switzerland*

2. Applicability of Policy

By registering for the Systems you accept this Policy and the obligations contained herein.

3. Data protection officer:

EU data protection representative pursuant to Art. 27 of the EU General Data Protection Regulation (GDPR) or of the person responsible in accordance with Art. 5 lit. j of the Swiss Federal Law on Data Protection (FADP)

Ralf Winzer, contact via our contact form at
<https://www.zehndergroup.com/de/unternehmen/kontakt>

4. Data collected and processed

A variety of different data is transmitted during your use of our Systems. The following data and information is stored and/or processed by Zehnder or our Service providers (Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Grand Duchy of Luxembourg):

- Operating system used
- Version and language version of the mobile App

- Country from which our systems are accessed
- e-mail address as well as further personal data as optionally provided by the user like, like name, address,
- Configuration information from the system: type of room, name assigned to Airdentifier
- Data recorded by Airdentifier (such as air quality data like CO2, temperature, humidity, TVOC and particulate matter content, notifications when those values cross thresholds),
- Optional addition data provided by the user during use of the product, about the environment in which the Airdentifier Device is placed.
- Airdentifier diagnostic data like power supply, battery status, uptime
- WiFi SSID and password of the local WiFi network to connect Airdentifier and keep it connected.
- Information for maintaining, customising, optimising or improving the System or the app.

When downloading the Zehnder Airdentifier App, information relating to this download is transmitted to the app store provider (Apple's App Store, Google's Play Store). Zehnder has no influence on this data collection and is not responsible for it.

5. Purpose of data processing

The data is processed to enable the user to use the Systems and for Zehnder to document their technical functioning, to optimise and further develop the systems, to document and analyse user behaviour in the context of the indoor climate, to provide advice for improvement of the indoor air quality, to be able to support users in the event of defaults, to send push-messages to inform users about changes of the indoor climate and to make personalised offers for optimising the indoor climate. You can access the operating data of your Systems via the Airdentifier App

We process usage data for statistical evaluation of the user behaviour of our Systems. This data is stored as described in Section 6. This data provides input for optimising our Systems and for developing new or improved applications.

6. Data storage

The data collected as described in Section 2 is deleted or blocked as soon as there is no longer a purpose for storing this data.

7. Data transmission

We may forward your personal data collected as described in Section 4 of this Policy to other affiliates of Zehnder, to Airgloss S.r.l., as well as to third parties designated in this Policy. In addition, they can be passed on to employees of Zehnder, of affiliates of Zehnder or of Airgloss S.r.l.

These recipients may be located in countries that do not have an equivalent level of data protection. You expressly agree to your data being transmitted to these countries. We ensure data protection with our Group affiliates and Airgloss S.r.l. contractually through standard data protection clauses per Art. 46(2)(c) EU GDPR and/or Art. 16 para. 2 letter a Swiss data protection code.

8. Consent to data processing

By registering for the Systems and accepting this Policy, you consent to the collection and processing of your data by Zehnder and to the transmission of your data to third parties in accordance with this Policy.

9. Spaces equipped with Devices not exclusively used by owner of Devices

Property owners may choose to install Devices in locations that are (mainly) used by third parties (such as tenants). The following provisions are applicable only if spaces equipped with Zehnder devices are used by third parties that are not the owners of these Devices, such as tenants. In the following, the owners of the spaces equipped with the Devices are referred to as property owners and third parties to whom the spaces equipped with the Devices are made available referred to as tenants.

It is the sole responsibility of the property owner to inform tenants of the presence of such Devices, the fact that data from these Devices will be processed by Zehnder, and to obtain tenant's consent where necessary. Zehnder may, if necessary, request proof of tenant's consent from the property owner and the property owner agrees to provide Zehnder with the respective documentation.

Upon termination of the lease, tenants are obliged to disconnect their App from the Devices installed in the apartment. The property owner is responsible to verify upon termination of the lease with the tenant that the tenant disconnects their App from the Devices.

If the Devices are not owned by the property owner (e.g. rental of Devices), the property owner and the owner of the Devices are jointly and severally liable for compliance with these obligations. Failure to comply with these obligations may not only constitute a breach of this Policy but may also be a breach of relevant data protection legislation.

10. Your rights

You have the following rights vis-a-vis us regarding the personal data relating to you:

- Right to information
- Right to correction or deletion

- Right to restriction of processing beyond processing needed for the technical function of the Airdentifier platform
- Right to revoke consent for processing beyond processing needed for the technical function of the Airdentifier platform
- Right to data portability
- Right to file a complaint with a data protection supervisory authority regarding the processing of your personal data by us.

Whenever data processing is solely based on your consent, you can revoke your consent at any time, with effect for the future, without providing reasons by de-registering the Airdentifier and choosing to delete the data at the same time and stop using the product or by deleting your account.

11. Data security

We encrypt data transmissions and implement various technical and organizational safeguards to protect your personal data.

12. Miscellaneous

Due to further development of our services, it may become necessary to amend this Policy, in which case we will keep you informed.