1. Introduction

We are committed to protecting your personal data privacy. We will use your data in accordance with our obligations under data protection legislation.

This privacy policy explains what information we collect from you, or you provide to us, when using our websites, Smart Thermostats and associated apps, and how it will be used.

By using our websites, products and registering with our apps you consent to the practices described in this policy.

Warmup Plc. is the data controller in relation to the processing activities described in this policy.

Our Data Protection Officer is David Stimpson.

If you have any questions about this policy, including any requests to exercise your data rights as explained in section 10 of this policy, please contact us using the details below.

Data Protection Officer, Warmup Plc., 702 & 704 Tudor Estate, Abbey Road, London. NW10 7UW.

Email address: personaldata@warmup.com

2. Changes to this privacy policy

We may change this policy at any time; if we do, the new privacy policy will be displayed on this page.

3. Links from our sites and apps to other sites

Our sites and apps may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that we are not responsible for the observance of data protection regulations or data security of these websites.

Please check you are satisfied with their privacy policies before you submit any personal data to these websites.

4. Data we collect from you and how we use it

We collect and use your personal information only with your knowledge and where when there is a legal basis to do so.

The circumstances where we collect your personal data are outlined below.

Browsing our sites

If you access our website on a purely informational basis i.e. browsing without using additional functions such as contact forms or social media links, we automatically collect personal data from you. Your device’s Internet Protocol (IP) address is transmitted by your browser. We use Google Analytics to help us improve our websites by understanding how visitors are using and engaging with our website.

The Google Analytics tracking tool uses cookies to collect information and report website usage statistics and does so without personally identifying individual visitors to us or to Google.
Cookies

Cookies are small text files implanted by our site on your computer when you visit our site. Cookies collect personal data about you and are used to retain user preferences and store items in shopping baskets. The cookie is retrieved each time you visit our sites, so you don’t need to re-enter information later and they enable certain features on the site to work.

This is a list of the main cookies on our websites and what each is used for.

<table>
<thead>
<tr>
<th>Cookie name</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facebook targeting</td>
<td>Facebook ad cookies are used by Facebook to target paid adverts to the relevant audience</td>
</tr>
<tr>
<td>Google Analytics</td>
<td>Used by Google to track analytics behaviour, goals and visits</td>
</tr>
<tr>
<td>Google Analytics_utma</td>
<td>Used by Google to track analytics behaviour, goals and visits</td>
</tr>
<tr>
<td>Google Analytics_utmz</td>
<td>Used by Google to track analytics behaviour, goals and visits</td>
</tr>
<tr>
<td>Wordpress_test_cookie</td>
<td>Cookie used by WordPress CMS to keep user session data</td>
</tr>
<tr>
<td>Google tag tracking</td>
<td>Marketing tag used by Google Analytics to track user interaction with website</td>
</tr>
<tr>
<td>PHP SESSION</td>
<td>A cookie used by forms which collect customer data</td>
</tr>
<tr>
<td>Cookie Notice</td>
<td>This displays the cookie policy and remembers if the cookie was accepted</td>
</tr>
</tbody>
</table>

We may also collect information about your computer, including your domain name, operating system, browser version, how long you stay on a page, the route you took to navigate through the pages and the website you visited prior to accessing our site.

You can refuse to accept cookies by activating the relevant setting on your browser. Please note that if you select this setting you will be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will still issue cookies when you log on to our site.

Filling in forms on our sites

When completing our website contact us, quote request or registration forms you will need to provide us your personal information. This is so that we can contact you, to enable the purchase and registration of a product, or to activate a warranty.

In addition to processing your request, we would also like to send you information about related products and services that we feel may be of interest. We will however only contact you with this information if you have given us consent. If you do not wish to receive marketing information, please tick the relevant box situated on the form which we collect your data.

Purchasing products from us

We use Stripe to process Sie Wireless Smart Thermostat payments in our online store. Stripe is a PCI DSS Level 1 certified payment platform. We do not store your card details.

We need to collect your name and contact details including telephone number, email address and postal address so we can process your payment and arrange delivery of the product. If you would like to use a professional installer, we utilize HomeServe who have a network of installers. To enable the equipment to be installed we pass the name address, email and contact phone number to HomeServe. This information is only used for the purposes of installation.

Interacting with us on social media

We have a presence on Facebook, Twitter, Instagram, Google+, YouTube and LinkedIn. If you would like to participate in discussion boards, enter a competition, promotion or survey, or follow us to receive job related updates you would need to provide information such as your name and email address when registering.

We do not collect any personal data other than that which is collected by the social media service itself. We recommend that you review the privacy policies for these social media sites before using them.
Using a Smart Thermostat and associated apps

Personal information you provide to us:

<table>
<thead>
<tr>
<th>Data type</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td>To allow comparisons of energy usage and patterns with local area. Information is grouped to compare areas with other areas</td>
</tr>
<tr>
<td>Name</td>
<td>To address the user appropriately when using the interface</td>
</tr>
<tr>
<td>Email Address</td>
<td>To allow Warmup to contact the user with information about their account</td>
</tr>
<tr>
<td>Postcode(s)</td>
<td>To allow comparisons of energy usage and patterns with local area. Grouped to compare areas with other areas—this may include publication of information in an anonymised form</td>
</tr>
</tbody>
</table>

Once you have registered and set up an account with us, we will collect and process information regarding your energy usage and factors affecting the heating profile in your house, both while you are using our products and for a period afterwards. This information will be used to carry out studies and market research to evaluate the effectiveness (both in the short and long term) of our product and to monitor heating usage data to provide better energy tariffs for the user.

The SmartGeo™ function which uses the location service built into your phone, does not track your exact location. It only calculates the approximate distance from your property.

With regard to each of your visits to our apps, we may automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you through them and our apps.

5. Our legal bases for processing your personal data

We only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use your personal information.

In each case, the legal basis will be one of the following:

Contractual obligations

We rely on this basis where processing of personal data is necessary to provide you with the information, products and services that you request from us. For example, if you purchase a product from us, we will need your name and address to arrange delivery of the product to you.

Consent

For home owners we may use and process their personal information to send promotional information relating to our product and energy saving advice. We will only send this information when we have obtained prior consent. We do not pass on personal details to other companies for marketing purposes.

It is possible to opt out of receiving promotional information by clicking the unsubscribe link at the bottom of any promotional email we send, or by contacting us at personaldata@warmup.com.
Legitimate interests

We will rely on legitimate interests

- To maintain, monitor and improve the performance of our websites.
- To enable us to create new services and improve the profile of our products.
- To send related promotional information to our business customers.

We will ensure this is done in a legitimate way which does not affect privacy and other rights.

Legal compliance

We rely on this basis

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation.
- To enforce or apply our Terms and Conditions or Terms and Conditions of Supply and other agreements.
- To protect the rights, property, or safety of Warmup Plc, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6. Disclosure of your information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and other third parties that require the data to select and serve relevant adverts to you and others. We may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement in any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example women in SW1). The information may be used to help us, and third parties analyse heating and energy usage. We may make use of the personal data we have collected from you to enable us to comply with our advertisers’ wishes by displaying their advertisement to that target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies, for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

7. Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. If we do so we’ll make sure that suitable safeguards are in place before this take place, for example by using approved contractual agreements, unless certain exceptions apply.
8. Data security

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. All information you provide to us is stored in secure cloud-based servers.

We use SSL encryption technology to protect your personal data against loss, theft and misuse, unauthorised access and disclosure.

We regularly monitor our system for possible vulnerabilities and attacks, to identify ways to further strengthen security.

Please note the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9. Retention periods

We will only hold your personal information for as long as necessary, based on the following criteria:

- As determined by legal and regulatory requirements.
- For as long as we have reasonable business needs, such as managing our relationship with you or to honour a product warranty.

10. Your data rights

Under data protection law, you have rights. The rights applicable to you in relation to how we process your information are explained below.

To be informed

- This privacy policy contains information about how your personal information is processed.

To access

- You have the right to ask for a copy of the information that we hold about you. Please note we may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

To rectify data

- If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us.

To object to us processing of your personal information

- You may withdraw consent to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please select the unsubscribe option in the marketing email.
To restrict our processing of your personal information

- You can ask us to temporarily limit the use of your data where you believe it is unlawful for us to use it; or
- You have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings.
- In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

To have your personal information erased

- In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. Please note asking us to erase data associated with a registered Smart Thermostat would reduce the functionality of the Thermostat.

To make a request to us about your data rights, please contact personaldata@warmup.com

If submitting a request about your data, please clearly state the nature of the information you require.

For data security purposes, we may ask you to provide proof of identification if we cannot identify you from the contact details provided. Any identification information provided by you will not be retained by us.

We will review your request and our Data Protection Officer will respond back to you within a month of receipt.

We will not charge a processing fee if the request is straightforward. Please note if the request is complex, unfounded or repetitive we may need to extend the processing time to two months and charge a processing fee. If this is the case, we will inform you within one month.

We will endeavour to process your request in full; however, if we are unable to fully action your request we will let you know within one month of receiving your request and explain why.

If you are not satisfied with the response you receive from us, please contact us at: complaints@warmup.com.