

Privacy Policy

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1. Introduction

1.1 This Privacy Policy describes how AmSmart AS, with registered address Bråtealléen 7, 1465 Strømmen, Norway, (from now on referred to as «**AMS**», «**we**», «**us**», «**our**» or similar) collects and processes information about you and your alarm system in AmSmart.biz and all associated websites and services (from now on referred to as “**the service**”).

As a Data Controller AMS acts according to the current data protection privacy laws in EU (GDPR). GDPR demands that any processing of personal data must have a legit purpose. AMS’s purpose for processing personal data will, according to GDPR, consist of consent from the person itself or because it is demanded by law. It can be necessary to process personal data to fulfil an agreement with the person, to fulfil a court order, to protect the persons vital interests, to exercise a task of public interest or to safeguard a legitimate interest if the privacy protection of the data subject does not exceed this interest.

2. Information we collect and how we use it

2.1 Information you provide us. You can provide us information, including information that can identify you (personal data) when you use the service, communicate with us through different channels, joins competitions, campaigns or surveys. When we ask for data from you we will collect this personal through our partners, or via online forms in the service. You can choose to provide us further data when you communicate with us or in any other way interacts with us.

2.2 Personal data you provide will be used for you to use our service and in addition also for administrative purposes and for debugging purposes. If you agree to it, or there is an existing customer relationship between you and AMS, this information can also be used to send you marketing material, see section 4.1 below. As described in section 2.6 below we might also use such information to other purposes when they are combined with other information we collect about you.

2.3 Information we collect automatically. When you visit our web site, or use our services through Android/iOS application, we can automatically collect IP address, login information, location, browser- and app type/version, operating system, platform, information about your visit/use of the website/service, error reports. We collect information automatically through cookies, this is further described in section 6 below.

We also collect smart home data (including, but not explicit, images either when you choose to take pictures manually or through presets, or when an alarm is raised) from HD-cameras, PIR camera sensors, Z-wave units and other units (connected to your

smart alarm system that is connected to AMS through Amazon Cloud). These smart home data are stored for 30 days and then automatically deleted. In addition, these data are stored for 7 days in backups.

2.4 we use the information that we collect automatically to the following purposes: (i) control your identity towards your smart home system login and usage; (ii) ensure that the content of the service is presented in the most efficient way for you and your units; (iii) as a part of the work to keep the service safe and secure; (iv) give you relevant data from devices connected to your smart home gateway whenever it is needed; (v) update and complement existing personal data already registered in our database.

2.5 Information we receive from other sources. We can receive information about you if you use connected services, including other AMS services and connected companies. This can be (but not limited to) credit card payment services, delivery services, alarm companies, guard companies, advertisement companies and so on, and receive information about you from these. This also includes information that is publicly available.

2.6 Combination. Where the law allows it, we can combine information we receive from other sources (see section 2.5 above) – i.e. from social media – with information you give to us and that we collect about you, including information from cookies. This can be done to make relevant functions, advertisement, offers and content for you as an end user that is customized to your interests and needs.

3. How do we share and forwards your personal data

3.1 We can share information with AMS's collaborators/third parties (with collaborators we mean dealers, service providers, installers – with third parties we mean functions/systems like social media and customer portals) for those purposes described in this privacy policy.

3.2 We can also share personal data with third parties; (1) when it is necessary to involve a service provider to organize or extend our service; (2) when you explicit has asked for it (i.e. through social media); (3) when it is required based on a court order, other legal or regulatory demands; (4) when a company is sold or transferred to others; (5) to enforce our user regulations; (6) to ensure safety and security for users, consumers and third parties; and (7) to protect rights and properties belonging to us or third parties.

3.3 AMS will not share, sell, impart or in any other way disclose personal information except for those mentioned in this Privacy Policy without your consent. This is not an obstacle to use a data processor that processes the personal information on our behalf, and according to GDPR.

4. Consent to receive newsletters and direct marketing.

4.1 To keep you updated, we can – when you agree to it or when there is an active customer relationship – use the information you provide us to marketing purposes. This includes newsletters and other inquiries regarding content, services, offers, campaigns and arrangement from us, our collaborates and partners through e-mail, phone, SMS and social media. You can at any time terminate your consent for this.

5. Analysis and advertising

5.1 We can use tools from third parties to make advertises more relevant and interesting for you. To do this, we use cookies, web beacons or similar technologies to collect information on how you use our services (see section 2.3 and 2.4 above) and deliver interest-based ads to you.

5.2 We can do such analysis our self or we can use third parties. If we use third parties, this company will be subject to a data processor agreement according to GDPR that requires confidentiality and that the information is solely used to its intended purposes.

6. Cookies and other technology

6.1 We collect information automatically by using cookies. A cookie is a text file that contains small amounts of data that a web site can send to your browser and from there be stored on your computer as a code that identifies your computer from other computers but keeps your identity anonymous. Some of our sites might use cookies to give you a better user experience when you return to the web page later. You can set up the browser to alert you before you receive cookies, and, in that way, you can decide for yourself if you accept it. You can also deactivate support for cookies, but by doing this we cannot guarantee that the service will work properly.

7. Links to other web pages and social media

7.1 If we share links to other web pages, we do this only for information purposes. These web pages are outside our control and are therefore not covered by this privacy policy. If you choose to open other web pages by using links from us, these pages can collect information about you that will be used according to their privacy policy. This might differ from our privacy policy.

8. Data storage

8.1 We store information that is necessary for you to have an operational system at your premises, or to comply with legal requirements. Be aware that we can keep some personal information after you have terminated your account if this is necessary to comply with legal requirements. This could be (but not restricted to) information about tax and for accounting purposes.

8.2 You are entitled to have all your personal data stored with us deleted upon request, without traceability, if we are not required to keep this by law. You can contact our **Data Protection Officer** with this request: **support@elkotech.no**

9. Transfer of personal information to foreign countries

9.1 Your personal data can be transferred to foreign countries, including our cloud service provider Amazon. Transferal of personal data within EU/EEA-area can be done according to GDPR.

9.2 If we transfer personal data outside EU/EEA we will ensure that the transfer is done according to current legislations. This means that we will obtain consent from you or use other mechanisms to ensure a legally correct transferal.

10. Your rights

10.1 If you want to receive a copy of some or all personal data we have stored about you, you can contact us to receive this. Before we can process a request for this we will need to confirm your identity by asking for some details. We will aim to give you the requested data within reasonable time and latest within the time limit (if any) provided by the law.

10.2 You have a responsibility to give us correct, precise and complete information, and to keep it updated at all time. You can update your personal information by contacting your local service provider for AmSmart.

11. Information security

11.1 We use appropriate security measures to protect personal data that are in our hands against unauthorized access, collection, forwarding, revelation, copying, modifying or removal.

12. Questions regarding this privacy policy

12.1 Websites and social media channels are maintained by AMS. If you have questions, concerns or complaints regarding this privacy policy or how we handle it, please contact us.

12.2 AMS reserves the right to update this privacy policy regularly. When there are major changes you will be asked to read it and accept it again.