



BeAware Privacy statement (GDPR)

**This document was originally created on June 8, 2020 and will be updated on a regular basis.**

At BeAware, we respect and protect your privacy. In this document you can read and get insight into how we handle your personal data.

This document describes the treatment of data provided on or collected at our digital platforms and or devices. This gives a visitor and or user the possibility to access our web-applications, platforms and indoor climate services. This Privacy Statement and the BeAware GDPR Policy complies with the EU General Data Protection Regulation 2016/679 ('GDPR') and Danish Law.

BeAware is responsible for collecting, storing and processing your data. BeAware is registered in Denmark under registration number CVR.nr. 37061638 with its registered office at;

BeAware A/S  
BLOXHUB  
Bryghusgade 8  
1473 Copenhagen  
Denmark

The handling and importance of data protection and handling of your personal data in accordance with the applicable law, in particular in accordance with the General Data Protection Regulation of 27. April 2016 ("GDPR"). Our goal is to provide you with full information and control regarding the processing of your data and the availability of tools that allow you to take advantage of the rights arising from the law.

Below we present information on which personal data we process about you, how we process your personal data and the legal basis under which we process your personal data. You may also read about rights as a data subject, how we care for the security of your data and who we share it with. If you have additional questions about how we use your personal data, pls. do not hesitate to getting in touch with us: [hello@beaware.today](mailto:hello@beaware.today)

**The "data-responsible" FOR THE PROCESSING OF YOUR DATA is:**

BeAware A/S  
BLOXHUB  
Bryghusgade 8  
1473 Copenhagen  
Denmark

**is the controller for the processing of your personal data.**

The "data-processor is"

BeAware A/S  
BLOXHUB  
Bryghusgade 8  
1473 Copenhagen  
Denmark

The "data-processor" has appointed a DPO, Daniel Bachmann, BeAware A/S

**Storage of data, in countries outside of the EU and EØS (3<sup>rd</sup> party countries)**

In case of storage of data in 3<sup>rd</sup> party countries, we adhere to Binding Corporate Rules, and not without the acceptance of, "Concent" by the user/ users. Consent is voluntary, specific, and informed (See "Informed Consent")

**WHEN DO WE PROCESS YOUR DATA?**

This is how we process your personal data in the following situations:



- You have decided to purchase a BeAware product, based on the Terms and Conditions, which you can read on our website.
- You have agreed to receive commercial information.
- You have set up an account on our platform BeAware Platform ("Platform"). The platform operates based on the Terms and Conditions, which you can read here.
- You have sent us a support request through our website ("Request").
- You have sent us a message via the Contact form.
- You are our contact-person with our suppliers, customers or any other third party.

We focus on the transparency of processing your personal data. If you have any question about the process or rules of processing, please contact us.

We process your data in accordance with applicable law, ensuring that it remains current and correct. Therefore, from time to time we will remind you about the need to update the data by sending a message to the e-mail address provided by you.

Your personal data will not be processed for automated decision making without your consent.

#### WHICH PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSES DO WE PROCESS THE DATA?

##### You have decided to make purchases in our webshop

When you make a purchase in our Store, we will process personal data about your name, billing address, delivery address, e-mail, phone number.

We will process your personal data for the following purposes:

1. In order to carry out the sales contracts concluded with you at any time.
2. In order to conduct complaint processes.
3. For statistical purposes for internal needs.
4. In order to confirm the performance of our obligations and assert claims or defend against claims that may be directed against us, prevent or detect fraud.

The legal basis for processing your data will be to fulfil the contract concluded with you (GDPR article 6(1)(b)); to comply with a legal obligation (GDPR article 6(1)(c)); or to fulfil our or our partners legitimate interest (GDPR article 6(1)(f)).

We will process data from you, only to the extent necessary to fulfil the purposes described above and, in the terms and Conditions section. It is up to you to decide whether and what data you provide us with, but remember that when making purchases in the Store, providing certain data will be mandatory to perform the contract of sales, because without them we will not be able to process your order. Failure to provide the data we require, will result in failure to complete an order.

##### You have agreed to receive commercial information

When you agree to receive commercial information, we will process personal data about your name and e-mail address.

We will process your personal data for the following purposes:

1. If you give your consent, we will send (to the e-mail address provided by you) commercial information regarding the goods offered for sale in the Store, including promotional offers.
2. If you give your consent, we will send (on the mobile phone number provided by you) commercial information regarding the goods offered for sale in the store, including promotional offers.
3. For statistical purposes for internal needs.
4. In order to confirm the performance of our obligations and assert claims or defend against claims that may be directed against us, prevent or detect fraud.



The legal basis for processing your data will be to your consent (GDPR article 6(1)(a)); to comply with a legal obligation (GDPR article 6(1)(c)); or to fulfil our or our partners legitimate interest (GDPR article 6(1)(f)).

You are not required to give your consent to receive commercial information. If you give your consent, you will be able to withdraw it at any time by contacting the above data or clicking on the link that we send in each e-mail containing commercial information. Withdrawal of consent does not affect the correctness of data processing in the period before its withdrawal.

#### When you have set up an account on the BeAware Platform

When you set up an account on the Platform we will process personal data about your e-mail, house nickname, activity logs, data generated by the data indoor climate data, data collected by the installed devices (e.g. data, weather data), list of installed devices, push notification devices enabled, geo-location of the building typology, rooms based on the gateway location (IP) and other relevant information.

We will process your personal data for the following purposes:

1. Service availability - setting up the Platform account, from which you will have access to the services,
2. Identification of you as a user on the platform,
3. Service & billing related communication with you,
4. Normal operation of the system,
5. Sending you notifications from the installed devices (e.g. motion detection),
6. Quality of service and reliability,

The legal basis for processing your data will be to fulfil the contract concluded with you (GDPR article 6(1)(b)); to comply with a legal obligation (GDPR article 6(1)(c)); or to fulfil our legitimate interest (GDPR article 6(1)(f)).

It is up to you to decide whether and what data you provide us with on the Platform, but remember that when setting up an account on the Platform, providing certain data will be mandatory to provide you the service, because without them you will not be able to login to your secure account, have access to the functionalities of the Platform, manage and control your integrated devices and/or receive notifications from the devices.

#### You are our contact person with our suppliers, customers or any other third party

When you are our contact person with our suppliers, customers or any other third party we will process personal data about your name, e-mail, telephone number(s), title, company you work for.

We will process your personal data for the following purposes:

1. We process data about in order to contact you and correspond with you as your contact person at a company.

The legal basis for processing your data will be to comply with a legal obligation (GDPR article 6(1)(c)); or to fulfil our legitimate interest (GDPR article 6(1)(f)).

#### WHO WILL WE DISCLOSE OR SHARE YOUR PERSONAL DATA WITH?

Depending on the personal data involved, the purpose of the processing and the context in which personal data is included, we may disclose your personal data to third parties (as independent data controllers). We may also share personal data with our suppliers when necessary for the purpose of the cooperation (as data processors).

#### You have decided to make purchases of a BeAware device or service

We will pass your data to entities that cooperate with us in the performance of the contract for the sale of goods purchased by you.



We will share your data necessary for the delivery of goods to a freight forwarder: who will in return, share your data with one of the following entities, depending on our choosing in how to best deliver the goods to you:

1. GLS (General Logistics Systems),
2. DHL Express,
3. FedEx,
4. UPS
5. LEMAN International System Transport A/S
6. Other entities that will provide delivery services for goods purchased by you in the Store in the future.

Depending on your choice of payment method for purchased goods, we will share your data necessary for collection or payment for purchased goods to the following entities:

1. A third-party payment service provider

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

You have agreed to receive commercial information

We will share your information with the entities providing on our request with the service of sending commercial information, such as:

1. MailChimp (MailChimp's Privacy Policy: <https://mailchimp.com/legal/privacy/>)
2. HubSpot (HubSpot's Privacy Policy: [https://www.hubspot.com/privacy-policy](#))
3. We may also share your personal data with other entities from the above categories with which we will establish cooperation.

You have set up an account on the Platform

Our Platform and Apps are using: Amazon Web Services (AWS), Push notification services (Google Cloud Messaging, Apple Push Notification service), Google+.

TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

We will seek to keep all personal data within the European Union or EEA; it is not our intention to export data.

HOW LONG WILL WE PROCESS YOUR PERSONAL DATA?

The personal data provided by you will be processed for the time necessary to fulfil the purposes described in this privacy policy. e.g.:

- Your data may be retained for the period necessary for the fulfilment of the contract of sale, and for the period for defending us against claims that may be directed against us. This will be no longer than 10 years from the date you provided us with your data,
- Your data in the Platform will be retained for as long as necessary for providing you access to the Platform; therefore, we will be processing your data as long as the service is required.

HOW ARE WE PROTECTING YOUR DATA?

We will ensure the confidentiality, integrity and availability of the personal data that we process through technical and organisational security measures.

We use a range of IT and organizational security measures aimed at minimizing the risk of data leakage, their destruction and disintegration, such as: firewall system, cyber security good practices, internal access procedures, data processing and emergency recovery, as well as a multi-level backup system.



All third-party services are trusted platforms with big communities. BeAware A/S is using latest security standards in order to use, build on top off and/or integrate with those services.

Our Store operates on a platform with a very high level of security and we use a high level of encryption HTTPS/SSL connection in accordance with accepted best practices.

#### WHAT RIGHTS DO YOU HAVE IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA BY US?

According to the GDPR, you have a number of rights in connection with providing your personal data to us, such as:

1. The right to know how your personal data is processed - if you have questions about whether and how we process your data, please contact us by sending information to us, we will be happy to answer them.
2. The right to access and update data - you always have access to your personal data on your account on the Platform (or via App). If you have not created an account in the Store or on the Platform, please contact us by writing to our Data Protection Officer requesting access to your data - we will inform you about your data and update it at your request,
3. Under the terms of the GDPR, you also have the rights to:
  1. Data rectification - You can edit the data provided to us and update it.
  2. Data deletion - if you want us to stop processing your data, you can delete your account in the Store or on the Platform or report such a request to us. Remember, however, that this is not an absolute right and we may refuse to delete your data about which we have a basis for its processing (e.g. the fulfillment of a legal obligation or pursuing claims or defending against claims that may be directed against us),
  3. Request to limit the processing of your data,
  4. Object to the processing of your data if the basis for processing is our or our partners legitimate interest or performance of tasks in the public interest,
  5. Object to the processing of your data, where personal data are processed for direct marketing purposes.
  6. Withdrawal of consent, if the data is processed on the basis of your consent,
  7. Data transfer, if the processing is based on a contract or your consent.

If you will like to use any of your rights, please contact us on our email.

#### HOW LONG TIME WILL IT TAKE FOR YOU TO GET THE ANSWER FROM US?

We will do our utmost to reply to your requests as quickly as possible. In any case, you should receive a message from us not later than within 14 days of receiving your request. During this period, we will give you an answer or inform you about the extension of the deadline and explain the reasons. If we have doubts as to whether you are making a specific request, we may ask a few more questions to verify your identity.

#### INFORMATION ON THE COMPETENT AUTHORITY

If you feel that we are processing your personal data unlawfully, you can also file a complaint with Data Protection Agency in Denmark (<https://www.datatilsynet.dk/>).

If you have any questions related to the processing of your personal data by us or you want to use the rights resulting from the GDPR, please use the contact form or write directly to our Data Protection Officer.

#### UPDATES TO THIS PRIVACY POLICY

From time to time, we may need to update this privacy policy. We regularly review our privacy policy to ensure that it is updated, accurate and in accordance with applicable laws and principles for processing of personal data.

#### INFORMATION ON THE USE OF "COOKIES"

#### DEFINITIONS

BeAware A/S  
BLOXHUB  
Bryghusgade 8  
1473 Copenhagen  
Denmark



1. Administrator – See address above, which provides electronic services and stores and gains access to information on User devices,
2. Website - means a website or application under which the Administrator runs a website that operates in the following domains: <https://beaware.today>
3. Cookies - means IT data, in particular small text files, saved and stored on devices through which the User uses the Website pages,
4. Administrator's Cookies - means Cookies placed by the Administrator related to the provision of electronic services by the Administrator via the Website.
5. External Cookies - means Cookies placed by the Administrator's partners via the Website,
6. Device - means an electronic device through which the User gains access to the Website,
7. User - means an entity for which services may be provided electronically or with which an Agreement for the provision of electronic services may be concluded in accordance with the Regulations and legal regulations.

#### TYPES OF COOKIES USED

1. Cookies used by the Administrator are safe for the User's Device. In particular, it is not possible for viruses or other unwanted software or malicious software to enter User Devices. These files allow to identify the software used by the User and adjust the operation of the Website individually to each User. Cookies usually contain the name of the domain from which they originate, their storage time on the Device and the assigned value.
2. The administrator uses two types of cookies:
3. a) SESSION COOKIES: they are stored on the User's Device and remain there until the session of the given browser ends. The saved information is then permanently removed from the Device's memory. The mechanism of session cookies does not allow the collection of any personal data or any confidential information from the User's Device,
4. b) PERMANENT COOKIES: they are stored on the User's Device and remain there until they are deleted. Ending the session of a given browser or turning off the Device does not delete them from the User's Device. The mechanism of persistent cookies does not allow the collection of any personal data or any confidential information from the User's Device.
5. The User has the ability to limit or disable the access of cookies to his Device. If you use this option, the use of the Website will be possible, in addition to functions that, by their nature, require cookies.

#### THE PURPOSES FOR WHICH COOKIES ARE USED

1. THE ADMINISTRATOR USES OWN COOKIES IN FOLLOWING PURPOSES:
  1. SERVICE CONFIGURATION
    1. adjusting the content of the Website pages to the User's preferences and optimizing the use of the Website pages,
    2. recognize the Website User's device and its location and properly display the website, adapted to his individual needs.
  2. AUTHENTICATION OF THE USER ON THE WEBSITE AND PROVIDING THE USER'S SESSION ON THE SERVICE
    1. maintaining the Website User's session (after logging in), thanks to which the User does not have to re-enter their login and password on every subpage of the Website;
    2. correct configuration of selected Website functions, allowing in particular verification of the authenticity of the browser session,
    3. optimizing and increasing the efficiency of services provided by the Administrator.
  3. IMPLEMENTATION OF PROCESSES NECESSARY FOR FULL FUNCTIONALITY OF WEBSITES
    1. adjusting the content of the Website pages to the User's preferences and optimizing the use of the Website pages. In particular, these files allow to recognize the basic parameters of the User's Device and properly display the website, tailored to his individual needs;
    2. proper operation of the affiliate program, allowing in particular verification of sources of Users' redirects to the Website's websites,
    3. enabling the use of the "Clipboard" and "Cart" functions on the Website.
  4. ANALYSIS AND TESTS AND WATCH AUDIT
    1. creating anonymous statistics that help to understand how the Website Users use Website pages, which allows improving their structure and content.



5. ENSURING SAFETY AND RELIABILITY OF THE SERVICE
2. THE SERVICE ADMINISTRATOR USES EXTERNAL COOKIES IN FOLLOWING PURPOSES:
  1. presenting multimedia content on the Website, which is downloaded from an external website, e.g. youtube,
  2. collecting general and anonymous static data via analytical tools, e.g. Google Analytics,
  3. logging in to the website using a social website, e.g. Facebook.com,
  4. use interactive functions to popularize the Website using social networking sites, including such as Facebook.com, Twitter.com,
  5. using the functions to facilitate communication via the Website, which are downloaded from an external internet service.

#### THE POSSIBILITY OF DETERMINING THE CONDITIONS FOR STORING OR ACCESSING COOKIES

1. The User may independently and at any time change the settings for Cookies, specifying the conditions for their storage and access to the User's Device via Cookies. Changes to the settings referred to in the previous sentence, the User can make using the web browser settings. These settings can be changed in particular in such a way as to block the automatic handling of cookies in the web browser settings or to inform them whenever Cookies are placed on the User's device. Detailed information about the possibilities and ways of handling cookies are available in the software (web browser) settings.
  2. The User may at any time delete cookies using the functions available in the web browser he uses.
  3. Limiting the use of cookies may affect some of the functionalities available on the websites of the Services.
1. Changes to this BeAware Privacy Statement

From time to time, we may change this Privacy Statement to accommodate latest technologies, industry practices, regulatory requirements or for other purposes. At all times, we will post the most recent version on our digital platforms. We therefore advise you to read the Privacy Statement regularly. Where required by applicable law, we will obtain your consent.

2. Comments and questions

If you have a comment or question about this Statement, please contact Us.

You may file a complaint about the way we process your personal data. You can contact us by using the contact details stated at the end of this Privacy Statement. If a complaint is made, the name and contact details of the complainant must be provided to us. We will investigate the complaint and respond within one month. If you consider that we have failed to resolve the complaint satisfactorily, you may file a complaint to:

Datatilsynet  
Borgergade 28, 5.  
1300 København K  
Tel: 33 19 32 00  
E-mail: dt@datatilsynet.dk  
www.datatilsynet.dk

#### Contact details

BeAware A/S  
BLOXHUB  
Bryghusgade 8  
Denmark

[hello@beaware.today](mailto:hello@beaware.today)  
+45 31207080