YALE DIGITAL KEYS PRIVACY POLICY

BACKGROUND

This Privacy Policy forms a part of the Yale Digital Keys License and User Agreement and is part of the agreement between You and ASSA ABLOY AB (together with other relevant companies within the ASSA ABLOY group, collectively or individually (“We”, “Us” or “Our”)) for the Licensed Materials and Services (both as defined in the Yale Digital Keys License and User Agreement) (the “Agreement”).

www.yaleresidential.com/en/yale/yaleresidential-com/Residential/Yale-Real-Living/Mobile-Phone-Entry/Yale-digital-keys-NFC-EULA/ Capitalized terms in this Privacy Policy have the meaning given to them in the Agreement.

We respect Your right to privacy and are committed to following applicable data protection and privacy rules to safeguard Your rights. We want to make sure that You understand the type of information We collect about You, how it is used and how we protect it. You can withdraw Your consent at any time by contacting Us by email at service@yalelock.com.

We need to collect some information about You so that We can provide You with the Licensed Materials and Services. This Privacy Policy describes the information We collect about You (“Data”) and why We collect the Data and how that Data is treated and for what purposes We may share the Data and how You can contact Us about Your Data.

Please note: By using the Licensed Materials and Services, You consent to Our use of the Data as set out below.

A. The Data We May Collect
B. Why We Collect the Data
C. How We Obtain the Data
D. Whom may We disclose Data to?
E. Period of Retention and Use
   1. Transfer
   2. Precautions
   3. Children
   4. Changes
   5. Your rights to Access and Correct the Data
   6. Contacting Us

A. THE DATA WE MAY COLLECT

We may collect the following Data in connection with providing the Licensed Materials and the Services:

1. Your name, phone number, email address, user ID and password for the Licensed Materials and the Services;
2. Technical data and related information about the Device being used for the Services, including unique push device ID, operating system, application software and peripherals;
3. Information related to the use and performance of the Licensed Materials and Services; and
4. Information about Your use of Our customer services and support.

If you choose to activate certain features of the Licensed Materials and Services, We may need to collect the following additional Data:

5. Payment information; and
6. Location of Your use of the Services.

When you choose to activate certain features of the Licensed Materials and Services We may also need, in addition to collect additional Data, to access certain parts of Your Device:

7. Access to Bluetooth function on Your Device; and
8. Access to information on the Device if access is required to use a feature of the Services (such as use of Your address book to send keys to persons you have authorized to use your keys (“Recipients”).

You also acknowledge that when You are a Recipient and use a shared Yale Digital Key for access, the administrator of that Yale Digital Key (i.e., the person who sent a key to You to share) will be notified when You use that key.

You can withdraw Your consent at any time contacting Us by email at [service@yalelock.com]. However, if You withdraw Your consent for the collection of certain minimum Data required to provide the Service, We may no longer be able to provide You with the Service.

B. WHY WE COLLECT THE DATA

We collect Your Data to:

1. License the Licensed Materials or Services to You and to enable us to provide You with the Licensed Materials and Services and any associated products or services;
2. Provide you with software updates and support, improve and develop new products and services, and maintain and manage Our websites and other related services;
3. Communicate with You about the Yale Digital Keys Services;
4. Fulfill Our legal and administrative obligations (such as making tax returns/payments);
5. Enforce this Privacy Policy and the Yale Digital Keys License and User Agreement; and
6. Protect the rights, property or safety of Us, Our customers or others.
We do not sell or trade the Data that personally identifies You or collect or use Your personally identifying Data for advertising purposes.

C. HOW WE OBTAIN DATA
We obtain Data in a variety of ways. For example when You fill in the necessary Data to download and use the App and Services or contact Us directly by email concerning the use of the App or Services or from Your other transactions or experiences with Us.

D. WITH WHOM WE MAY SHARE DATA
We may share the Data with other companies in the ASSA ABLOY group, as well as certain trusted business partners and third party service providers (please find an overview of the entities that regularly receive the Data in Section 8 below) to enable them to perform functions of the Services and to process Data on Our behalf, in accordance with the purposes in Section B above.
We do not control, and are not responsible for, the privacy and data security practices of these third parties but We will take reasonable steps to ensure that the Data will only be used for the purposes described in this Privacy Policy and in accordance with applicable law, even if We do transfer or disclose Data to other companies within Our group of companies (the ASSA ABLOY group) or to Our suppliers or subcontractors. For an overview of the entities that regularly receive the Data, see Section 8 below.
If applicable, Data may also be transferred to:
• Local or foreign regulators, governments and law enforcement authorities, including tax collection agencies and stock or other exchanges;
• Local and foreign courts, tribunals, arbitrators or other judicial committees;
• Persons to whom We may assign or transfer Our rights or duties under this agreement or under any other agreement We may have with or concerning You;
• Persons in connection with any sale, merger, acquisition, disposal, reorganization or similar change of Our business (including any potential or actual purchaser of that business and that purchaser's advisors);
• Third parties, if so required to comply with mandatory legal or regulatory requirements; and
• Address fraud or technical issues.

E. PERIOD OF RETENTION AND USE
We will retain the Data for as long as is necessary for the relevant activity or services described above or for as long as we are lawfully required to do so.
Data which is personally identifying will be destroyed if:
• The purpose of collection and use of Data has been achieved and the Data is no longer needed for our business requirements or under applicable law;
• The business for the Licensed Materials or Services concerned is discontinued; or
• You withdraw Your consent to the collection of Data by contacting Us (for contact information please see Section 8 below).

1. Transfer
We may share Your information with other companies in our group or with our trusted subcontractors in order to provide the Services and for the purposes set out in this Privacy Policy. Processing of Data may therefore take place in countries other than Your home country. Data collected in the European Economic Area (the “EEA”), may be stored, processed or transferred outside of the EEA, as described in this Privacy Policy. The destination country may not offer the same level of protection of the Data as the country where You are located and may only provide you with fewer legal rights in relation to the Data. However, We will only process the Data as described in this Privacy Policy and use Our efforts to handle the Data securely and in accordance with applicable data protection rules. You expressly consent to Your information being used as set out herein.

2. Precautions
Unfortunately, transmission via the internet is not completely secure and we cannot guarantee the security of Data transmitted to Our website. You are responsible for protecting the Device against unauthorized access and use, and any transmission of Data will be at Your own risk. Once we have the Data, we will take commercially reasonable precautions to protect it from loss, misuse, unauthorized access, disclosure, alteration, and destruction. Despite the protective measures we put in place, You understand that no data security measure can guarantee complete security at all times.

3. Children
The Licensed Materials or Services are not directed to children under the age of 13, and We do not knowingly collect personal information from children under 13. If you are a Parent or legal guardian and choose to share Your Yale Digital Key with a child, you acknowledge and agree that we may collect Data relating to your child’s use of the Yale Digital Key and this Service solely in accordance with the terms of this Policy.

4. Changes
We may amend this Privacy Policy from time to time. We will use reasonable efforts to notify You before such change, through the Service. We will notify You to get Your consent before collecting any additional
personally-identifying Data or materially changing Our uses or sharing of Data that is personally identifying. As to all other changes to this Policy, we will publish a notice through the Service of the changes to the policy; by continuing to use the Licensed Materials or Services after a reasonable period to such notification, You are expressly acknowledging and accepting such changes. If we change this Privacy Policy we will post the revised Privacy Policy on our website and will indicate the revised Policy’s version number and effective date.

5. Cookies
We use cookies to remember your preferences. A cookie is a small file, typically consisting of numbers and letters, downloaded on to the Device when You [access certain areas of our websites]. Cookies allow the website to identify the Device and by analyzing the data from cookies we can improve our website and the associated user experience. For detailed information on the cookies we use and the purpose for which we use them, see our cookies policy at http://www.yaleresidential.com/en/yale/yaleresidential-com/Site-Functions/Legal-notice/#PrivacyPolicy

6. Your rights to Access and Correct the Data
The accuracy of the information We hold about You is important to Us. You have the right to access the information We hold about You and have any inaccuracies corrected. Any access request may be subject to a fee to meet Our costs in providing You with details if the information we hold about You.

If any of the information We hold about You is inaccurate or out of date, please let Us know by emailing Us (for contact information please see Section 8 below). We will respond within a reasonable period of time upon verification of Your identity.

7. Your rights regarding the Data
Except as described in points B and D, above, We do not sell or trade the Data or collect or use it for advertising purposes. You have the right to ask Us not to process Your personal data for marketing purposes. [We will inform You (before collecting Your Data that is personally-identifying) if We intend to use the Data for such purposes or if We intend to disclose it to any third party for such purposes. You can exercise Your right to prevent such processing at any time by contacting Us (for contact information please see Section 8 below).

8. Contacts
For the purpose of European data protection laws, the data controller is Sweden.
If You have any questions about how We use the Data, You can contact us at service@yalelock.com. For an overview of the entities that regularly receive the Data, see below:
Name and Contact: ASSA ABLOY Mobile Services AB (an ASSA ABLOY group company)
Role: Data Controller
Location: Sweden
Purpose of Collection, Use or Transfer: To license the Licensed Materials or Services to You and to enable Us to provide You with the Licensed Materials and Services and any associated products or services, provide You with software updates and support, improve and develop new products and services, and maintain and manage websites and other related services, communicate with You about the Services, fulfill Our legal and administrative obligations (such as tax returns/payments), enforce this Privacy Policy and the Yale Digital Keys Access License and User Agreement, protect the rights, property or safety of Our customers or others.

Nature of Data: See Data described in paragraph A, above
Period of Retention: See description in E above
Name and Contact: ASSA ABLOY Mobile Services AB (an ASSA ABLOY group company)
Role: Data Processor
Location: Sweden
Purpose of Collection, Use or Transfer: To initiate or revoke Services, provide updates, support, improvement and development of new products and services, maintenance of related services, carry out mandatory obligations, enforce this Privacy Policy and the Yale Digital Keys Access License and User Agreement

Nature of Data: See Data described in paragraph A, above
Period of Retention: See description in E above
Name and Contact: HID Global Corporation (an ASSA ABLOY group company)
Role: Data Processor
Location: U.S.A.
Purpose of Collection, Use or Transfer: To initiate or revoke Services, provide updates, support, improvement and development of new products and services, maintenance of related services, carry out mandatory obligations

Nature of Data: See Data described in paragraph A, above
Period of Retention: See description in E above

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Version 1.0, February 2015