



Privacy Statement **Posted and Effective: September 27, 2022**

Redev AI Ltd, (“Fogsphere”, “Redev AI”, “we,” “us” or “our”) values your privacy and your desire to know how we handle and use your information. Therefore, we provide this Privacy Statement, which explains our information practices. This statement applies to information, including Personal Data (which means any information relating to an identified or identifiable natural person), we obtain from and about individuals interacting with Fogsphere, its websites (the “Site”), products, and services. This Privacy Statement does not apply to Fogsphere employees.

This Privacy Statement may be updated from time to time. We will notify you of any changes to our Privacy Statement by posting the new Privacy Statement on our Site and updating the Effective Date listed above. The most current version of the Statement may be reviewed by clicking on the “Privacy” link located at the bottom of our Site. The purpose of this Privacy Statement is to explain the types of information we collect, how it is obtained, how it is used, how it may be shared with others, and your choices about its use and disclosure. If you are visiting our site from the European Union (“EU”) or where applicable EU data protection laws so provide, please see the section below titled, “Your EU Privacy Rights” for additional information.

What Personal Data We Collect

The types of information, including Personal Data, we collect from and about you include:

- Contact and demographic information collected online and offline (such as your name, company name, industry, address, telephone number, and email), such as when you register for the Fogsphere services or opt-in to receive newsletters from us.
- Purchase or product/service use history and account log-in credentials when you use Fogsphere services and set up a Fogsphere account.
- Information collected by and about the status of your cloud-connected devices (such as home sensor temperature and thermostat settings) both for predictive maintenance, functionality analysis, and the provision of services described further below.
- Data gathered by technology when you visit our Site (such as cookies and IP address).
- Marketing data from third parties that includes contact information.
- Any information you publicly post on our Site forums or comment sections.
- Job applicant data (such as name, email, resume, social media profiles (e.g., LinkedIn), cover letter, and any other information you upload as part of your application).
- Contact information from Fogsphere resellers that sell Fogsphere products or services on our behalf.

How We Use Your Personal Data

Fogsphere collects and uses Personal Data for our legitimate interests as set out herein and as necessary for the performance of a contract with you or based on your consent (in which case we would ask you separately to provide your consent to a particular processing activity).

We process your information, including Personal Data, for the following purposes:



- To provide the products and services you have registered for, purchased or requested (such as through customer support, troubleshooting, and billing).
- To host data received from cloud-connected devices on our platform in order to share that information with third parties with whom you have contracted (such as home automation applications), which allows you to know the current status of your devices and control your devices remotely through your third-party applications.
- To provide you with information about Fogsphere and its products and product updates.
- To register you for and deliver training and educational materials related to our products.
- To partner with your organization to offer complementary technology solutions (through our partner program).
- To diagnose, repair and track service and quality issues, including through analysis and predictive maintenance.
- To install and configure changes and updates to your services.
- To authenticate users of our products and services.
- To consider your Fogsphere employment application, which may also include processing necessary to comply with a legal obligation.
 - For marketing purposes.

We will keep your Personal Data as reasonably necessary to fulfil the purposes for which Personal Data is collected as stated herein; for as long as is necessary for the performance of the contract between you and us, if any; and to comply with legal and statutory obligations, such as in tax, trade and corporate laws. When we no longer need your Personal Data for our purposes, we will destroy, delete or erase that Personal Data or convert it into an anonymous form.

With Whom We Share Your Information

We may share your information, with third-party service providers working on our behalf or directly on your behalf, to deliver the requested products or services (in particular, hosting and maintenance services or a card-issuing bank to confirm payment for products and services you purchase from us). We host and subsequently share cloud-connected device status information with the third parties that you have chosen, such as HVAC manufacturers or home automation application providers that subsequently allow you to remotely monitor and control your cloud-connected devices through their services.

Occasionally we may be required by law enforcement or other public authorities as well as judicial authorities, courts or tribunals to share Personal Data with them or other parties. We will disclose Personal Data upon receipt of a court order, subpoena, warrant, or other legal process to the extent necessary to meet legal, national security, public interest, or law enforcement obligations or defend our interests in legal, administrative, or other proceedings, which may require us to share Personal Data with other parties to the proceedings and their external counsel. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

Fogsphere may also share information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets, including situations of insolvency, bankruptcy or receivership. If another company acquires our



company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Statement.

We may also share your information with other third parties in an anonymized or aggregate manner. Except as noted in this Privacy Statement (e.g., pursuant to an acquisition or merger) Fogsphere will not sell your Personal Data to any third parties.

We do not share your Personal Data with third parties for the third parties' direct marketing purposes.

Online Tracking and Advertising

Our Site automatically gathers certain traffic information, such as Internet Protocol ("IP") addresses and other numeric codes used to identify a computer, which may be considered Personal Data under applicable laws. However, this information is aggregated and may not personally identify you. It is collected to help us improve the Site and the services we offer.

For example, we may use IP addresses to monitor Site usage to better prepare for anticipated traffic patterns. We may also gather user information that we save on your computer (not on our server) as "cookies" in order to streamline the Site experience.

We use cookies and other similar technologies to maximize the performance of our Site and services, improve functionality by detecting some features of your device, and to remember your user-name, region and language choices you make. If you have registered your product and created a Fogsphere account, we match the information gathered from our cookies with any information you have given us about yourself, or that is stored in your Fogsphere account, or that we have otherwise collected about you for the purposes explained in this Privacy Statement.

We also use advertising providers that use targeting cookies and ads, to tailor information presented to you, and which link to services provided by third parties. Targeted advertising may collect Personal Data about users' online activities over time and across different websites.

For more detailed information about cookies visit www.allaboutcookies.org. To opt out from behavioural advertising by networks adhering to the Network Advertising Initiative visit <http://optout.networkadvertising.org/>.

You can opt out from any of these cookies by adjusting your browser settings to reject cookies. If you have previously visited our Site, you may also have to delete any existing cookies from your browser. Many of our cookies are functionality cookies and some of these cookies are managed for us by third parties. You can control the use of these cookies through your browser settings, but if you opt out from them, we may be unable to offer some services or support and we may also be unable to remember your preferences or that you did not want a certain service.

Google Analytics

We have enabled the Demographics and Interest Reporting feature of Google Analytics to collect demographic and interest information about our users. Google Analytics uses cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics only to improve our Site and Services. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other information. We do not combine the information generated through the use of Google



Analytics with your Personal Data. Although Google Analytics plants a persistent cookie on your web browser to identify you as a unique user the next time you visit the Site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can opt out of this by clicking [here](#).

California Do Not Track Disclosures

Some browsers have incorporated Do Not Track ("DNT") preferences. Most of these features, when turned on, send signals to the website you are visiting that you do not wish to have information about your online searching and browsing activities collected and used. As there is not yet a common agreement about how to interpret DNT signals, we do not honor DNT signals from web browsers at this time. However, you may refuse or delete cookies as described above.

Our Commitment to Children's Privacy

Fogsphere does not knowingly collect information from individuals under the age of 13. In the event that we learn that we have collected information from a child under the age of 13, we will delete that information.

Security Safeguards

Fogsphere will take reasonable steps to protect your Personal Data in our possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

Your Choices/Opting-Out

You can opt out of being further contacted by us by requesting such by email sent to privacy@fogsphere.com. You may also opt-out of receiving marketing or promotional email messages from us by clicking on the "Unsubscribe" link contained at the bottom of each email.

Your EU Privacy Rights

If you are visiting the Site from the EU or where applicable EU data protection laws so provide, you may exercise the following rights regarding your Personal Data, subject to certain legal limitations/restrictions:

- **Access.** You have the right to obtain from us confirmation if your Personal Data is being processed and certain information in this regard.
- **Rectification.** You have the right to request the rectification of inaccurate Personal Data and to have incomplete data completed.
- **Objection.** You have the right, when we process Personal Data on the grounds of legitimate interests, to object to the processing of your Personal Data for compelling and legitimate reasons relating to your particular situation, except in cases where legal provisions expressly provide for that processing. In addition, you have the right to object at any time where your Personal Data is processed for direct marketing purposes.
- **Portability.** You may receive your Personal Data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit them to other data controllers without hindrance. This right only exists if



the processing is based on your consent or a contract and the processing is carried out by automated means.

- **Restriction.** You may request to restrict processing of your Personal Data (i) while we verify your request – if you have contested the accuracy of the Personal Data about you which we hold; (ii) if the processing is unlawful and you oppose the erasure of it and request restriction instead; (iii) if we no longer need it, but you tell us you need it to establish, exercise or defend a legal claim; or (iv) while we verify your request if you have objected to processing based on public or legitimate interest.
- **Erasure.** You may request to erase your Personal Data if it is no longer necessary for the purposes for which we have collected it, you have withdrawn your consent and no other legal ground for the processing exists, you objected and no overriding legitimate grounds for the processing exist, the processing is unlawful, or erasure is required to comply with a legal obligation.
- **Right to lodge a complaint.** You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your residence, or the location where the issue that is the subject of the complaint occurred.
- **Right to refuse or withdraw consent.** Please note that in case we ask for your consent to certain processing, you are free to refuse to give consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

If you have questions about exercising any of those rights or their applicability to any of our particular processing activities or have questions about any data transfer mechanism or want a copy thereof, you may contact us at privacy@fogsphere.com or at the address provided below.

International Transfers of Your Personal Data

By using the Site or providing Personal Data to Fogsphere, your Personal Data may be transferred to the United Kingdom where Fogsphere is headquartered. If you are not a resident of the United Kingdom, your country's laws governing data collection and use may differ from those in the United Kingdom. Some of the third parties with whom we might share your Personal Data are also located in third countries that do not provide the same level of protection to your Personal Data. Certain third countries have been officially recognized by the European Commission as providing an adequate level of protection (list available here).

Contact Us

Unless otherwise stated, Fogsphere is a data controller for Personal Data processed subject to this Statement. If you have any questions about this Statement or if you believe that your Personal Data has been processed or disclosed in violation of this Statement, please contact us by sending an email to privacy@fogsphere.com, or a letter to:

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