

Yale Connect

PRIVACY POLICY

ASSA ABLOY ("we") is committed to protect your personal data concerning your use of this service **ASSA ABLOY**.

The purpose of this Privacy Policy is to describe how we collect and process the personal data received in connection with the use of the websites and mobile applications, which will be called "**Service**" in this policy.

This Privacy Policy applies to web sites and mobile applications owned by ASSA ABLOY Group entities in Latin America: Yale Connect, Yale Connect Video, Poli Connect, Udi Connect.

We will collect and process the personal data you provide through our websites and mobile applications.

What personal data will ASSA ABLOY process, and why?

ASSA ABLOY will process your personal data in accordance with the following description:

- To provide the Service you requested and granted your consent;
- To send marketing communications when we have your permission and/or when are allowed by law;
- To customize our Service (for example, so you can log in);
- Those obtained through the use of ASSA ABLOY virtual stores, including the type of device, the browser that you are using, geographical location, among others;
- In our "legitimate interest" (for example, sharing your personal data with other ASSA ABLOY affiliated entities);
- When we are required by "law" or by "legal requirements" (for example, tax and legal compliance, compliance with a judicial resolution).

ASSA ABLOY will process the personal data contained in this section to provide the service.

- The data that we collect and process originates mainly from the use of websites and mobile applications, required to use the Service;

Note: ASSA ABLOY does not have control over how other applications (e.g., Google, Facebook, LinkedIn, Instagram, Twitter, etc.) process, collect, store or use your data. We suggest checking the privacy and cookies policies on those websites before providing data. ASSA ABLOY will process your data to provide the service and assistance.

- Name (s) Last Name (s), email address, and phone number for account validation.
- Geographical location of your device, in order to establish point-to-point communication with ASSA ABLOY products.
- Information related to the use and technical data related to your device (for example, such as your IP address).

Note: ASSA ABLOY does not sell or rent your personal data to third parties outside the ASSA ABLOY group of companies.

Transfer of personal data.

ASSA ABLOY may transfer your personal data to the following categories of recipients to the extent necessary to complete the processes stipulated above or if it is legally required:

- Government agencies and institutions;
- Other legal entities within the ASSA ABLOY group;
- Our service providers, which are necessary to carry out the Service.

These third parties may only use your personal data in accordance with our instructions and policies.

International use.

We will exercise care when transferring data between the computer and device you use and our computers or servers (or service providers used to carry out the service). We have the mechanisms to safeguard your personal data to the extent possible.

We have our servers and offices in Latin America, the European Union, and the United States; for this reason, it is possible that, during one of the processes, your personal data can be transferred, store, processes in any of these locations.

As data protection, privacy, and other laws of the United States may not be as comprehensive as those in the European Union, we take many steps to protect your privacy and we offer a Processing Agreement for customers in the European Union. If you wish to request this, use the communication methods described at the end of this policy.

When using this service, you understand and agree that the collection, storage, processing, and transmission of your personal data, is carried out in our facilities in Latin America, the European Union, and the United States, for the service providers with those described in this policy and us.

How long will ASSA ABLOY store your personal data?

ASSA ABLOY stores personal data whenever necessary to fulfill the purpose for which it was collected unless we can or are required by you to store the personal data personal for a longer time.

ASSA ABLOY will delete your data when the law no longer forces us to keep it or when it is no longer necessary to provide the Service. At the end of the service, when the customer request it, the personal data will be deleted in a period of up to three (3) months of termination.

Right of access and rectification.

You have the right to request access to the personal data related to you. This includes the right to be informed if personal data is being processed or not. What personal data is being processed, and the purpose of the processing.

You also have the right to rectify or add personal data if the personal data is inaccurate and/or incomplete. As soon as we realize that inaccurate personal data is being 3 (6) processed, we will correct such personal data as soon as possible and notify you accordingly.

Right to delete.

You can request that your personal data be deleted, for example, in the following situations:

- If the personal data is no longer necessary for the purposes for which it was collected;
- If you oppose to the processing of personal data where we do not have a legitimate interest;
- If the processing is illegal; or
- If the personal data must be deleted to allow us to fulfill a legal requirement.

If you have any question about your right to delete, contact ASSA ABLOY Americas Divisional Data Protection Manager. Please note that we may deny your request if the processing is allowed or required in accordance with the law and/or any other legal reason.

To request the deletion, you must provide specific information about what you want us to delete, such as the URL of each page where the personal data is located, so that we can find it.

ASSA ABLOY is not compelled to remove any content or personal information if:

- ASSA ABLOY or a third party is required to keep it by any law.
- It was not requested by you;
- It is anonymized so that it cannot be identified;
- You did not follow our instructions to remove or request the removal.

Note: The deletion of your personal data from the Service does not guarantee the complete elimination of that personal data from our systems or the systems of our service providers.

Right to object.

You have the right to object to the use of your personal data that we have based on our legitimate interest. If you object, we will no longer process your personal data unless we can demonstrate that we have compelling legitimate grounds for processing that voids your interests or rights and freedoms or if we need them to establish, exercise or defend legal claims.

Right of restriction.

You can ask us to restrict the processing of your personal data in the following situations:

- If the processing is no longer necessary for the purposes for which it was collected or processed;
- If you withdraw your consent for the use of your personal data;
- If you believe that your personal data may not be correct;
- If you believe that the processing is illegal; or 4 (6)
- If we process your personal data according to our legitimate interest, where we have a higher interest concerning privacy interest.

Right to data portability.

If you request access to your personal data that have provided and if this personal data is processed automatically; You can request the data be provided in a structured format, commonly used and readable by a machine.

You can request that your personal information transfer it to another business. Only if this is technically possible, including if the cost is not burdensome for ASSA ABLOY.

Note: to exercise some of these rights, you could disable the communication between us and your devices, which could result that we could not provide the service that you requested to us.

Track usage statistics.

Our websites use Google Analytics, an analysis service provided by Google, to help us track usage statistics for our website visitors at an aggregate level.

Google Analytics collects information such as the frequency with which users visit the application and its geographical location. ASSA ABLOY uses the information to improve the technical performance of the application, optimize the performance of the application's functions, improve the experience of the users of the application, better adapt the application to the interests and needs of the users and make the application easy to use.

Google's ability to use and share information collected by Google Analytics about your visits to our website is restricted by the Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>).

For information on how Google uses your data when using the application, visit <https://www.google.com/intl/en/policies/privacy/partners/>.

By using and installing websites, you agree that Google Analytics collects and processes your data.

For information on how to withdraw your consent, visit <http://tools.google.com/dlpage/gaoptout>

With our websites, we may collect certain information automatically through various mechanisms, including but not limited to cookies. This collection may include, among others, the personal data described in **What personal data will ASSA ABLOY process and why?** section. We collect this (non-identifiable information) to help diagnose problems, administer the Service to help identify and gather broad demographic information.

A "cookie" is a text file that is stored on a computer for record-keeping purposes. You can find how we use cookies in our cookies policy. You can configure your browser to try 5 (6) to reject cookies. Please note that some features of the Service may not be available if your browser does not accept cookies.

Since we track the website usage information as described above, your selection of the DO NOT TRACK option in your browser may not affect our data collection. The only way we know to "opt-out" completely of collecting information through cookies or other tracking technologies is to delete and disable cookies and other recording/tracking tools in your browser.

Some of our websites and mobile applications may contain links to other websites, including social networks, such as Facebook, LinkedIn, Twitter, Instagram, etc. ASSA ABLOY is not responsible for the privacy practices or content of any of these linked

websites. These websites may collect personal data from you, which is not in our control. The personal data collection practices of the linked websites will be governed by the privacy policy of those websites.

We exercise care to protect all personal data transferred to third parties or other countries in accordance with the applicable data protection laws, as indicated above. No data transmission over the Internet can be 100% secure. There is always the risk that the information collected and displayed in the Service may be compromised, despite the steps we take to protect your personal data. For example, a third party may illegally intercept or access transmissions or private communications, or other users of the Service may abuse or misuse their personal data. Consequently, you accept that you are providing such personal data at your own risk.

Child privacy.

The Service is not and is not intended for children or minors under 18 years old; we do not intend and will not knowingly collect any personal data of children or children under the indicated age. If we discover that we receive personal data from a minor, we will delete it immediately from our servers (if not necessary or required by applicable law and this Privacy Policy). If you believe that the content of children under 18 has been published in our Service, notify us by contacting us at **Privacy.Americas@assaabloy.com**

Changes and updates of this Privacy Policye.

We may update this privacy statement from time to time, in response to legal, regulatory, and operational requirements. We will take appropriate and feasible measures to notify users of such changes (even when they will take effect). The latest version of our Privacy Policy is available through our website.

The Continued use of the Service after such updates take effect will constitute acceptance of those changes. If you do not accept any update of this privacy policy, you must stop using this Digital Service.

We will make every effort in good faith to resolve any correction request to inaccurate personal data except when: (1) the request is unreasonable; (2) requires a disproportionate effort technical or mind of expenditure; and (3) endangers the privacy of others or is not practical.

We will comply with the specific time required in the applicable laws to respond to your concerns, free of charge, if possible, for the business and the number of times it will allow, according to the applicable legislation.

Contact information and questions.

The requests to exercise your rights as stated above should be directed to: "Attention: Data Protection Manager ASSA ABLOY Americas" in:

ASSA ABLOY AMERICAS 110 Sargent DR.

New Haven, CT.06511 or **Privacidad.Americas@assaabloy.com**