



# Privacy and Data Policy

April 2024

# Privacy and Data Policy

## EDGE Connect+

EDGE Technologies Contract B.V. (EDGE or we) endeavors to protect the privacy of users of its mobile EDGE Connect+ application and services. Please read this Privacy and Data Policy carefully and in full before using the mobile EDGE Connect+ application.

## Introduction

This policy applies to the use of our mobile EDGE Connect+ application. It explains how we collect, use, share and protect personal data, both direct and indirect, and what rights you have in relation to this data. By downloading the EDGE Connect+ application, you have accepted our terms of use as set out in this Privacy and Data Policy, you have agreed to our processing of your data as described herein. If you do not agree with this policy, please do not use our EDGE Connect+ application and services.

Despite the constant care and attention EDGE is giving to the composition and functionality of the EDGE Connect+ application, it is possible that some of the services and information published is not functional, incomplete, or inaccurate.

EDGE is not liable for any direct or consequential damage of any kind, resulting from or connected in any way with the use of EDGE Connect+, the use of information retrieved by means of EDGE Connect+, or the temporary impossibility to consult and use EDGE Connect+.

## Who we are

EDGE is a company that offers smart, healthy, sustainable, forward-thinking, well-designed buildings and technology driving the cities of the future. EDGE is a private company with limited liability established under the laws of the Netherlands. We are registered with the Chamber of Commerce under number 24291656 and have our registered office at Marten Meesweg 8, 3068 AV Rotterdam, the Netherlands. You can contact us by email at [info@edge.tech](mailto:info@edge.tech). EDGE has developed the EDGE Connect+ application in cooperation with our solution partner, Innovatic. EDGE will act as controller of the data has entered into a Data Processor Agreement with Innovatic.

## What data we collect

We collect data and indirect personal data from your device when you use our products and services. Personal data means any information that can identify you as an individual, directly or indirectly. The types of data and indirect personal data we collect may include:

- Your IP address, device type, device location, usage of services and personal control actions and adjustments
- Your preferences and settings

## How we use data

We use your data and indirect personal data for the following purposes:

- To provide you a functional application and services.  
The mobile EDGE Connect+ application connects with non-personal data from various systems in a building and/or software of or used by user or user's organization in relation a building, for the purpose of personal setpoint control of the sunblind, lighting, heating, cooling, and ventilation systems.  
Additional features can optionally be enabled such as mobile access control via Salto to open door locks for you. Salto mobile access control can be enabled by allowing the application to connect with your Salto personal digital access key.
- To determine in which building you are, and which functionalities are available, and to share your personal preference adjustments with the right building system. We use the location function (GPS) (for global location determination)
- To determine in which area or room you are, and which functionalities are available, and to share your personal preference adjustments with the right area or room within the building. We use the Bluetooth and/or Camera functionalities of your mobile device for exact indoor area location determination. Bluetooth to receive Bluetooth beacon location signals from the sensors within the building, and in buildings with the Signify Visible Light Communication ("VLC") technology the camera to receive location signals via light frequencies to determine the exact location within a building.
- To improve, secure and develop our application, products, and services, and to measure and analyze their performance and usage and to reproduce a user's actions within the app in the event of bugs.
- To personalize your experience and to provide you with tailored suggestions and recommendations.
- To comply with legal and regulatory obligations and to protect our rights and interests.

## How we share data

We do not share data with third parties, except in the following cases:

- With your consent and at your request to adjust setpoints of building installations such as climate, lighting, and access control in your personal surroundings. We share your setpoint adjustments on an anonymous way

to building systems such as the Building Management and Control system, Light Management and Control System, and Access Management and Control System.

- With law enforcement, regulators, courts, or other authorities, if we are required or permitted to do so by law.
- With potential or actual buyers or sellers of our business or assets, or in connection with a merger, acquisition, reorganization or restructuring of our company.
- With solution partner Innovattic to build, maintain, host, and manage our EDGE Connect+ application.

## How we protect data

We take appropriate technical and organizational measures to protect your data against unauthorized access, use, disclosure, alteration, or destruction. We use encryption, firewalls, access controls, policies, and other procedures to safeguard your data. Innovattic is certified under the international standard for information security, ISO 27001, and we comply with applicable data protection laws and regulations, such as the GDPR.

## How we store data

We encrypt all your data and indirect personal data. We store your data and indirect personal data for as long as necessary to fulfill the purposes for which we collected it, or as required or permitted by law. We do not store your data or indirect personal data longer than required by law and no longer than necessary to deliver the service. When we no longer need your data or indirect personal data, we delete it or anonymize it. We store your data and indirect personal data within the EEA, using AWS cloud hosting services in the Netherlands and Germany.

## How we link to other services

The mobile EDGE Connect+ application and services may contain links to other services that are not operated by us. These services are provided for your convenience only. We are not responsible for the content, privacy practices or policies of those services. If you click on a link to use another service, you should read their Privacy and Data Policy and terms of use before providing any personal data. The following external services are embedded in the mobile EDGE Connect+ application:

- SALTO KS access control  
EDGE Connect+ application allows the users to enable the possibility to open door locks via Salto mobile access control. Salto mobile access control can be enabled by allowing the EDGE Connect+ application to

connect with your Salto personal digital access key. For this connection you have to login in the digital Salto environment to allow Salto to share the digital key via the EDGE Connect+ application with the Salto access control reader. The [privacy policy of Salto](#) applies for the Salto system environment and Digital key processing. The digital key is a personal access code which cannot be read by EDGE Connect+. EDGE Connect+ does not receive any personal data via Salto and has no insights in the use of the digital key.

## How we update this policy

We may update this policy from time to time to reflect changes in our application, products and services, or in the applicable laws and regulations. We will post the updated policy on our website and notify you of any significant changes in the application. The date of the last update is indicated at the top of this policy. Your continued use of our application, products, and services after we post the updated policy constitutes your acceptance of the changes.

## How you can exercise your rights

You have the right to access, rectify, erase, restrict, object to and transfer your indirect personal data that we hold about you. You also have the right to withdraw your consent to our processing of your personal data at any time, if you have given us your consent. You can exercise these rights by contacting us by email at [privacy@edge.tech](mailto:privacy@edge.tech). We will respond to your request as soon as possible, and in any case within one month. We may ask you to provide proof of your identity and additional information to verify and fulfill your request. We will not charge you any fee for exercising your rights, unless your request is manifestly unfounded or excessive.

## How you can contact us

If you have any questions regarding the content of EDGE Connect+, please contact EDGE's spokesperson Marlène de Jong. For questions regarding our privacy and data policy please contact us through [privacy@edge.tech](mailto:privacy@edge.tech).