

**Effective Date: April 15, 2020, Version 1.0**

**PRIVACY STATEMENT/YOUR PRIVACY RIGHTS – Light ARchitect™ MOBILE APPLICATION**

**If you are a California resident, please click [here](#) for more information about your specific privacy rights.**

**If you are in the European Economic Area (“EEA”), please click [here](#) for more information about your specific privacy rights.**

Cooper Lighting, LLC (“COOPER LIGHTING,” “us,” “we,” or “our”) owns and operates the Light ARchitect™ mobile application and associated websites (“**Mobile Application**”) and the augmented reality-based services provided through or while using the Mobile Application (collectively, the “**Services**”). COOPER LIGHTING, as the data controller, is committed to protecting the privacy of those who access the Mobile Application and use the Services. This Privacy Statement (“**Statement**”) contains details about how COOPER LIGHTING collects, uses, and shares with third parties Personal Data (defined below) that we obtain from and about you when interacting with COOPER LIGHTING and the Services. Please read this Statement carefully. If you do not agree with our policies and practices, do not download, install or operate the Services, do not access or use the Mobile Application, and do not interact with any other part of the Services.

**Applicability:** This Statement covers only the Services identified above and does not apply to information that you may send us by other means or related to other COOPER LIGHTING products or services. Other COOPER LIGHTING sites, applications and online services or locations may have their own privacy statements, and you should consult those accordingly. This Statement also does not apply to job applicants or our employees unless they are users of the Mobile Application.

Whenever you interact with COOPER LIGHTING or the Services on behalf of another individual or entity, such as by providing or accessing Personal Data about another individual, you represent that you have the authority to do so. You shall have sole responsibility for any violation of privacy laws as a result of a failure to obtain any necessary consent from such individual/entity.

**Changes:** COOPER LIGHTING may update this Statement from time to time. The current Statement will be posted at the bottom of the home screen for the Services and will be effective when updated. Please check this Statement periodically for updates. If any of the changes are unacceptable to you, you should cease using the Services. When required, we will notify you of any changes to this Statement. If any changes to this Statement materially affect how we treat or handle Personal Data that you have already provided to us or that has otherwise been collected by us, or when required under applicable laws, we will seek affirmative consent from you, by email (if we have a valid email address to use), to use it in the new manner. If you do not provide such consent, Personal Data will continue to be used in a manner that is consistent with the version of this Statement under which it was collected, or the information will be deleted.

### **What Information Do We Collect?**

Personal Data (“**Personal Data**”) is any information relating to an identified or identifiable natural person (“**Data Subject**”).

#### ***Sources of Personal Data:***

We collect information about you and how you use the Services in several ways, including:

- **Information you provide to us directly.** We collect the information you provide to us directly, such as when registering on or accessing the Mobile Application, signing up for offers, or communicating with us.
- **Information collected or inferred from your use of the Services.** We collect information about the Services and how you use them, such as information collected automatically when you visit or use our Mobile Application, download a mobile application, or otherwise interact with the Services.
- **Information from third parties.** To the extent permitted by applicable law, in addition to our websites, applications and other digital channels, we may also obtain information about you from other third party sources, such as public databases, joint marketing partners, social media platforms and content providers, companies that provide or sell lists of potential purchasers, and other Services users.
- **Information from Social Network Services (‘SNS’).** Depending on your social media settings, if you choose to connect your social media account to your COOPER LIGHTING account, certain data from your social media account will be shared with us, which may include data that is part of your profile. If you interact with us through SNS we might process your personal information in accordance with this Statement. What data we process will depend on what personal information you have provided to the SNS (such as your name, email address and other information you have made publicly available) when creating your account. Note that the data we collect from and through a SNS may depend on the privacy settings you have set with the SNS and the permissions you grant to us in connection with linking your account with our products or services to your account with an SNS. Your interactions with third parties through an SNS or similar features are governed by the respective privacy policies of those third parties and your agreement with the SNS. You acknowledge that you are entitled to use your SNS account for the purposes described herein without breach by you of any of the terms and conditions that govern the SNS.

We may combine information that we receive from the various sources described in this Privacy Statement, including third party sources, with Personal Data and use or disclose it for the purposes identified below.

#### ***Information We Collect:***

The types of information that COOPER LIGHTING collects about you include:

- **Contact and account information**, such as your name, postal address, email address, phone number, user name and password
- **Financial information**, such as your credit/debit card number or bank account number (if any product or service purchase capability is incorporated into the Mobile Application)
- **Demographic information**, such as your age, race, gender, education, or date of birth
- **Technical information gathered when you interact with the Services**, such as IP address, browser information, ICCID, device type, app and OS version

- **Internet or other electronic network activity information**, such as your browsing history, search history, and information regarding your interactions with and use of the Services (including the Mobile Application, and advertisements)
- **Employment information**, such as job title, employment history, or other professional information
- **Commercial information and preferences**, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- **Geolocation data**
- **Audio, electronic, visual, thermal, olfactory, or similar information**, such as pictures
- **Inferences** drawn from any of the information we collect to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

### **How Do We Use Your Personal Data?**

We may use your information in a number of ways, including:

- **To provide you with the Services**, such as to register and administer your account, provide Services you may request; support your Services; diagnose, repair and track service and quality issues; communicate with you about your Services; install and configure changes and updates to your Services; authenticate users of our Services; verify your eligibility for certain programs or benefits; or to respond to your requests, complaints, and inquiries.
- **For our own internal business purposes**, such as to evaluate or audit the usage, performance and safety of our Services; evaluate and improve the quality of our Services and design new services; operate the Site and customize the content; internal research purposes; display or evaluate the effectiveness of our advertising or marketing efforts; or maintain internal business records.
- **For legal, safety or security reasons**, such as to comply with legal requirements; protect the safety, property or rights of COOPER LIGHTING, Services users, or others; and detect, prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity.
- **For marketing**. We may use your Personal Data to market our products or services or those of third parties. When required by law, we will seek your consent for such marketing.
- **In an anonymous or aggregated format**. We may also use your information in an anonymized or aggregate manner for any purpose.

When you install and open the Mobile Application, you may be asked to register with COOPER LIGHTING and thereby to establish an account. Establishing an account requires that you provide to COOPER LIGHTING your designated email address and that you select and enter a password. The Mobile Application may also request permission to send you notifications and to allow access to your locations while using the Mobile Application, as well as request access to your camera or photos while using the Mobile Application. You may withhold your consent to receive notifications or to allow the Mobile Application to access your location, camera, or photos but doing so may impact your ability to fully utilize the Mobile Application. If applicable, after registering using the Mobile Application, you will be sent a verification email to the email address you provided for the purpose of verifying your account ID. You will be instructed to click on the link in the verification email to complete the registration process and to continue with your Mobile Application experience.

In addition to the information collected in the registration process described above, once you have registered, we may ask you for additional information to create a user profile such as your telephone number, address, and in some cases, credit card or other billing information for additional services you may order which may be stored by a third party processor with which we have a business relationship. Answering these questions allows us to establish and maintain your user account. After you complete the registration process, your account registration allows you to provide certain additional basic profile information, including photos. Names and profile photos may be shown to others in connection with the Mobile Application. You should only use photos you are willing to make public. Your email address will be stored and used as an identifier for you and for communications to you from COOPER LIGHTING.

If we ask you to provide us with your data, but you chose not to, in some cases we will not be able to provide you with the full functionality of our products, services, systems or applications. Also, we might not be able to respond to requests you might have.

### **With Whom Do We Share Your Information?**

We may share your Personal Data with entities other than the COOPER LIGHTING entity that originally collected it, including the categories of recipients described below:

- **Affiliates and subsidiaries:** Due to our global nature, we may share your Personal Data with our parent company Signify N.V. and its affiliates, subsidiaries, business units and other companies that share common ownership for the purposes described above.
- **Third party service providers:** We may share your Personal Data with third party service providers working on behalf of COOPER LIGHTING in order to provide the Services you request or support our relationship with you, such as IT providers, accountants, analytics companies, and marketing providers.
- **For legal, security and safety purposes:** We may share your Personal Data with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our [Terms of Use/Legal Notice/End-User License Agreement](#) and other agreements; and to protect our rights and the property or safety of COOPER LIGHTING, our users, or third parties.
- **In connection with a transaction:** If we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy, we will share your Personal Data with that entity.
- **Third parties for their own purposes:** To the extent permitted by applicable law, we may sell your Personal Data to third parties for their own marketing, research, or analytics purposes.

We may also share Personal Information that has been anonymized or aggregated with third parties for any purpose.

### **Cookies and Other Tracking Technologies**

Please click [here](#) for information about how we use cookies and other tracking technologies, including online behavioral advertising.

### **Data Security and Retention**

COOPER LIGHTING maintains reasonable security procedures and technical and organizational measures to protect your Personal Data against accidental or unlawful destruction, loss, disclosure or use of personal data we handle. When handling your Personal Data for our business functions, we will limit access to your Personal Data to authorized

persons and trusted third parties who have a reasonable need to know the information in order to perform our Services who are bound by confidentiality obligations. While COOPER LIGHTING takes the issue of protecting your Personal Data seriously, you should exercise discretion in what information you disclose and/or transmit through the Services. COOPER LIGHTING cannot guarantee that information sent over the Internet is fully secure, and therefore the transmitted information may be intercepted by others before it reaches us. COOPER LIGHTING is not responsible for the security of information sent over the Internet. If you are concerned about sending information to us over the Internet, please send the information by mail or call us to make other arrangements. If you have reason to think that your interaction with us is no longer secure or your Personal Data is no longer being processed in a secure manner, please reach out to our [Central Privacy Office](#) immediately as described below.

COOPER LIGHTING retains Personal Data only for as long as necessary to fulfill the stated purpose for which the Personal Data was collected or otherwise processed, and thereafter only for legitimate legal or business purposes. These may include retention periods that are: (i) mandated by law, contract or similar obligations applicable to COOPER LIGHTING's business operations; (ii) for preserving, resolving, defending or enforcing our legal/contractual rights; or (iii) needed to maintain adequate and accurate business and financial records. We will delete Personal Data when the respective purpose for its use is complete and no legal obligation to retain such data exists. The criteria used to determine our retention periods include:

- How long is the data needed to provide you with our products or services or to operate our business?
- Do you have an account with us? In this case, we will keep your data while your account is active or for as long as needed to provide the services to you.
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation, or protection against a possible claim.

### **Children's Privacy**

We do not intentionally collect information from children under the age of 16.

- *Special note to children under the age of 16:* if you are under the age of 16, we advise that you speak with and get your parent or guardian's consent before sharing your data with us.
- *Special note to parents of children under the age of 16:* we recommend you check and monitor your children's use of our products, systems, services, applications (including websites and other digital channels) in order to make sure that your child does not share personal data with us without asking your permission.. If you believe that we have inadvertently collected Personal Data from a child under the age of 16, please contact us at the address below and we will take immediate steps to delete the information.

### **Your Responsibilities**

We would like to remind you that it is your responsibility to ensure, to the best of your knowledge, that the data you provide us with are accurate, complete and up-to-date. Furthermore, if you share with us data of other people, it is your responsibility to collect such data in compliance with local legal requirements. For instance, you should inform such other people, whose data you provide to us, about the content of this Statement and obtain their prior consent.

### **External Links**

The Services may contain links to external sites or other online services, including those embedded in third party advertisements or sponsor information, that are not controlled by COOPER LIGHTING. We are not responsible for the privacy practices and data collection policies for such third-party services. You should consult the privacy statements of those third-party services for details.

### **Terms of Use**

The Terms of Use/Legal Notice/End-User License Agreement for the Services is incorporated by reference into this Statement, and can be found [here](#).

### **Contact Info/Your Choices**

COOPER LIGHTING aims to provide you with access to your Personal Data. Usually you can autonomously control your data (e.g. by logging in to your account) and update, modify or, if legally possible, delete it. In this case, we strongly encourage you to take control of your Personal Data.

You can always contact our Central Privacy Office if you would like to:

- review, change or delete the Personal Data you have supplied to us (to the extent COOPER LIGHTING is not otherwise permitted or required to keep such data)
- object to certain data processing operations (e.g., opt-out from marketing communications) involving your Personal Data
- receive a copy of your Personal Data (in a common machine-readable format, to the extent it is required by applicable law);
- ask us any other questions related to the protection of your Personal Data by COOPER LIGHTING

For any questions or reasonable inquiry related to the protection of your Personal Data or regarding this Statement in general, you can contact our Central Privacy Office:

- Mail: Signify - Attn: Privacy Office – Herikerbergweg 102, 1101CM Amsterdam Zuid Oost, The Netherlands; or
- Online: Signify Privacy Center, "[Privacy request](#)" section, or
- Email: [privacy@cooperlighting.com](mailto:privacy@cooperlighting.com)

To opt-out of receiving promotional email messages from us, please click on the "Unsubscribe" link contained at the bottom of each email or by contacting us using the information above.

### **California Privacy Disclosures Section**

The California Consumer Privacy Act ('CCPA') provides California resident consumers with specific rights regarding their personal information. In addition to the above, this section describes your CCPA rights and explains how to exercise those rights.

The following is not applicable to de-identified or aggregated personal information or data publicly available.

### **Information We Collect**

In the execution of our services and/or when using our Mobile Application we collect information that identifies, relates to, describes, references, is capable of being associated with, or could

reasonably be linked, directly or indirectly, with a particular consumer or device (defined as “data”).

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES

H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We disclose your data for a business purpose to the following categories of third parties:

- Group companies.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your Personal Data in connection with products or services we provide to you.

### **Data from Children**

We do not intentionally collect information from children under the age of sixteen (16) years as we do not offer services to them. Parents who set up a profile holding information about children under the age of sixteen (16) years can only do so by granting parental consent, which consent choices can be changed by the adults in the family. We do not direct services to children under the age of eighteen (18) years old. As a result, thereof we do not knowingly process data or information from children under eighteen (18) years old.

### **Do Not Sell**

We do not respond to "Do Not Sell" requests as we do not track your data across third party websites, nor do we sell your data to third parties to provide targeted advertising. Nonetheless, we aim to make your online experience and interaction with our websites as informative, relevant and supportive as possible. One way of achieving this is to use cookies or similar techniques, which store information about your visit to our site on your computer. For more information on how we use cookies and other tracking technologies, read our Cookie Notice (see section "Cookies and Other Tracking Technologies")

## **Your Rights**

“Right to Know”: You have the right to request that we disclose to you what personal information of yours that we collect, use, and/or disclose.

“Right to Delete:” You have the right to request the deletion of your personal information collected or maintained by us.

If you have questions about the foregoing or how to execute your Right to Know and/or Right to Delete in our State or specifically with regard to categories and specific pieces of data processed, categories of sources from which your data is collected by us, categories of third parties with whom we share your data in the preceding 12 months of its collection and the business or commercial purpose for collecting please contact our Central Privacy Office (see section “Contact Info/Your Choices”).

If we cannot verify your identity (or an authorized agent acting on your behalf), we have the right to deny requests. While verifying your identity we shall generally avoid requesting additional information from you for purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information from you, which shall only be used for the purposes of verifying your identity while you are seeking to exercise your rights under the CCPA, and for security or fraud-prevention purposes. We shall delete any new personal information collected for the purposes of verification as soon as practical after processing your request, except as required to comply with applicable legislation.

An “authorized agent” means a natural person or a business entity registered with the Secretary of State that you as a consumer have authorized to act on your behalf, conditioned you have:

1. Provided the authorized agent written permission to do so and we could verify this; and
2. Verified your own identity directly with the business.

Subsection 1 does not apply when you have provided the authorized agent with a valid power of attorney.

We endeavor to timely respond to a verifiable individual, free of charge and in a portable format unless it is excessive, repetitive or material unfounded. If we require more time, we will inform you of the reason thereof and extension period in writing.

## **Non-Discrimination**

We will not discriminate against you for exercising your rights under the CCPA. Unless permitted by applicable regulations, we will not charge different prices or rates, deny products or services, provide different products or services or level of quality and/or suggest you may receive the foregoing mentioned.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your data’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

## **EEA Section**

This section applies if you are an EEA data subject. In the event of a conflict between information in this section and the rest of the Statement, this EEA Section will govern.

Our legal basis for collecting and using the Personal Data as data controllers will depend on the Personal Data concerned and the specific context in which we collect it. In many cases, we will process Personal Data about you using the following legal basis:

- Legitimate interest – we process Personal Data to meet our legitimate business interests, such as to develop and improve our solutions, support our sales and business operations, and secure our systems, facilities and personnel.
- Legal obligation – we process Personal Data to comply with applicable laws and regulations.
- Performance of Agreement – we process Personal Data in order to perform or fulfill our obligations under an agreement with you or the entity with which you are affiliated.
- Consent – We may process your Personal Data based on consent. For example, if we want to send you a marketing communication, we will seek your consent. You may withdraw your consent at any time by contacting us at the information in the “Contact Us” Section above.

## **International Transfers of Your Personal Data**

By using the Mobile Application or providing Personal Data to COOPER LIGHTING, your Personal Data may be transferred to the United States where COOPER LIGHTING is located. If you are not a resident of the United States, your country’s laws governing data collection and use may differ from those in the United States. For example, the data protection laws of the United States have not been found by the European Commission to provide the same level of protection as EU data protection law. Transfers to countries outside the European Economic Area (“EEA”) take place using an acceptable data transfer mechanism, such as the EU-U.S. Privacy Shield, the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and Certifications, or on the basis of permissible statutory derogations. Please contact our Central Privacy Office (you will find the contact details in the section “Contact info/Your Choices?”), if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.

## **Your EEA Privacy Rights**

If you are using the Mobile Application from the EEA or where EEA data protection laws apply, with certain legal exceptions and limitations, you may exercise the following rights regarding your Personal Data:

**Access.** You have the right to confirm with us if your Personal Data is being processed and certain other information about that processing.

**Rectification.** You have the right to request the rectification of inaccurate Personal Data and to have incomplete data completed.

**Objection.** You have the right to object to the processing of your Personal Data for compelling and legitimate reasons. In addition, you have the right to object at any time if your Personal Data is processed for direct marketing purposes.

**Portability.** You may receive Personal Data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit that data to others.

**Restriction.** You may request to restrict processing of your Personal Data.

**Erasure.** You may request to erase your Personal Data.

**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.

**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.

**Right not to be subject to automatic decision-making, including profiling.**

If you have questions about exercising any of your rights or whether they apply to a particular processing activity, you may contact us via our [Central Privacy Office](#).

### **How We Use Cookies and Automatic Data Collection Tools**

When you access the Mobile Application or Services, open an e-mail marketing communication or download a COOPER LIGHTING mobile application, we or our third-party service provider may collect information through the use of a "cookie" or other device recognition technology. These tools send a small file to your browser that is unique to you and can only be read by our or our third-party service providers' web servers. These files provide information that helps us customize your experience on our websites or mobile application and provide relevant advertising to you.

### **Types of Cookies We Use**

We or our third-party service providers may use cookies or similar tools to collect information about your and other visitor's browsing behavior such as IP address, type of browser used, domain name and pages visited or mobile application usage. This information is used to learn about the usage and effectiveness of our web properties in order to improve how our Mobile Application or Services works and for advertising purposes. These cookies are session and persistent cookies. Some cookies may be used to track you across devices.

Specifically, we use the following cookies and tools:

<b>Purpose</b>	<b>Provider/Type</b>
Capture web metrics such as how often users visit this Site, what pages they visit when they do so, and what site referred a user to this Site.	Google Analytics, see <a href="#">Google Privacy Policy</a>
Retargeting	

Provide digital advertising	
Measure effectiveness of marketing campaigns.	Eloqua, see <a href="#">Oracle website</a>

### **Changing Cookie Preferences**

Most browsers are set to accept cookies. Using the “help” feature on your browser (e.g., Google; Microsoft; Apple; Mozilla), you can manage your browser cookie preferences to, for example, automatically accept cookies, automatically decline cookies, or notify you before receiving a cookie.

You can find more information about cookies generally at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you use our websites, Mobile Application, or Services and choose not to disable cookies, you agree that we or our service provider can place them on your device. Please note that refusing a cookie may affect your ability to access certain content or functionality offered by our website, Mobile Application, or Services. We do not process or honor other “Do Not Track” signals.

### **Online Advertising**

COOPER LIGHTING advertises on the websites or mobile applications of third parties. These third parties may use cookies or tools to gather information about your browsing activities in order to provide advertising relevant to your interests.

You can manage your receipt of targeted advertising by visiting these websites: in the EU, <https://www.youronlinechoices.eu/> and for U.S. and other regions, <http://www.aboutads.info/consumers>.

### **Marketing Communications**

We provide digital marketing communications about our Services with an unsubscribe mechanism in each communication. You can unsubscribe from any particular communication by clicking on “unsubscribe” in the email itself.

This Statement was last updated on April 15, 2020.