

**Last Update: 01/06/2025**



## **HANWHA VISION PRIVACY POLICY**

Hanwha Vision America, Inc. and our affiliates ("HVA," "we," "us" or "our") respect your privacy. This privacy policy ("Privacy Policy") describes the types of personal information we obtain about you, how we collect, receive, use, store, transfer and process that personal information, to whom we may disclose it, and the choices and rights you have available regarding our use and sharing of your personal information.

This Privacy Policy applies to HVA's collection, use or disclosure of personal information when you:

- use or access HVA's products, including HVA cloud products for which you have purchased a subscription through a HVA distributor, dealer or other partner, or directly or indirectly from HVA or its affiliate or the portal from which you access the HVA products and services (the "HVA Products");
- access or use a mobile application or website made available by HVA which references this Privacy Policy;
- receive communications from us or otherwise communicate with us offline, including but not limited to emails, phone calls, texts or faxes.

(the foregoing, the "Services")

The term "you", as used in this Privacy Policy, means any person who accesses or uses the Services, including

- **"End Customers"** are customers of HVA Dealers or other individuals or entities who are using or accessing the HVA Products and who are not HVA Dealers; and
- **"HVA Dealers"** are resellers, dealers, partners and system integrators who are using the HVA Products in their capacity as service providers for their customers.

This Privacy Policy is incorporated into the terms of service or terms of use applicable to the specific Service that you use. If you do not agree with this Privacy Policy, you should not use our Services or any other sites or services that link to this Privacy Policy.

The Privacy Policy does not apply to the practices of End Customers, or any other third party, that use the Services, or otherwise collect, use, share, or process personal information via our Services. These third parties, including End Customers, are responsible for maintaining their own privacy policies and for ensuring that they have obtained the necessary authorizations and consents for any collection, use, and disclosure of personal information using HVA Products. This Privacy Policy does not apply to information we process as a data processor or service provider on behalf of our End Customers or any other third party.

## **INFORMATION WE COLLECT**

For the purposes of this Privacy Policy, "personal information" means any information relating to an identified or identifiable individual.

### **Information We Obtain About You**

The context within which we obtain or collect your personal information depends on your relationship with us. We collect and process the following categories of personal information directly from you in connection with the use of the Services:

- **Account Registration Information:** If you create an account, your contact information, such as name, phone number, and email and postal address, including your business contact information, business profile image (if any) and business website address.
- **Account Credentials and Third Party Authentication Information:** To authorize access to the account or access to, account information, such as username, password and other log-in details used to access the Services, including any information we receive through your use of third party authentication services (e.g., your Google Account).
- **Payment and Financial Information:** Payment information, such as name, billing and shipping address and payment details, including information obtained through the use of third party payment services (e.g., PayPal). Detailed payment card information and direct debit/bank account information are collected and may be stored by a third-party payment processor. Your payment information is also subject to the privacy policy of the applicable processor.
- **Geolocation Information:** If you consent to its collection, the geolocation of your mobile device(s) used to access the Services and the location and address of where you install your Services.
- **Correspondence and Communications Information:** When you subscribe to our email newsletters, contact us by email, use any of our customer support tools, or use any of the methods specified in the "Contact Us" section below, we may collect your name, email address and any other personal information contained in those communications, including any content you submit to us.
- **Marketing Surveys:** From time to time, we may also ask you to participate in marketing surveys to help us improve our products and services. If you choose to participate in our surveys, you may be asked to provide general demographic information or feedback. Your participation in our surveys is always voluntary. If you do not wish to share your demographic information or feedback with us, you do not have to. If you do participate, we may use your responses, together with other responses we receive, to evaluate and improve our products. We will never publicly disclose your survey responses in a manner that will divulge your personal information or link your responses to you.
- **Product Usage Information:** Depending on the Services, we may collect the following types of personal or other identifiable information.
  - Product setup information: such as the name and description or nickname of your HVA Product (for example, "Dome Camera – Back Porch");
  - License information: License order and license key information, and license status (e.g., activated or expired) with respect to access to the HVA Products;
  - Technical information: about your use and setup of our HVA Products, including the product's model, serial number and software version, your authentication ID or token, and technical information regarding any other hardware and associated system requirements with which the HVA Products interact, and status of your use of the HVA Products (e.g., turned on/off, error or warning messages);
  - Technical support information: personal information relating to technical support services we provide, including all the information referenced above, information about your business operations, as well as personal information relating to your personnel (name, role, contact information, etc.)

### **Information Processed Through HVA Products**

If you are an End Customer or other customer of HVA, HVA may process the following types of personal or other identifying information about you or other individuals depending on the HVA Products you access or

use and where you use it. As noted above, HVA only processes this information as a data processor or service provider on behalf of our End Customers.

- Audio or video recordings: Any personal or identifying information contained in video, images, and audio recordings;
- Biometric information: biometric information, which includes, without limitation, facial features and geometry, physical attributes of an individual; and
- Object detection information: information about vehicles (license plate numbers, auto make and model, color, etc.) or other certain objects that appear in video footage captured by HVA Products.

Privacy and video surveillance laws in your jurisdiction may apply to your use of HVA Products. You are solely responsible for ensuring that your use of our HVA Products complies with applicable law. You are responsible for displaying any legally required notice(s) concerning your use of the HVA Products, including, for example, signage that alerts visitors and/or employees that you are recording them. You also are responsible for ensuring you have obtained and maintained appropriate consent from individuals, including written consent in jurisdictions that require it prior to collecting biometric information. Capturing, recording or sharing video or audio content that involves other people may affect their privacy rights. Your use of HVA Products as an End Customer is subject to your individual privacy policies, unless otherwise expressly referenced since we simply manage this data on your behalf.

### **Information We Collect Through Automated Technologies**

We may use automated technologies, including cookies, SDKs, web server logs, web beacons and other technologies, to collect information about your interaction with the Services. We may use these automated technologies to collect information about your devices, browsing actions, and usage patterns. For example, when you use our services, we may use analytics technologies to retrieve information from your browser, including the website you came from, the search engine(s) and the keywords you used to find the Services, the pages you view, your browser add-ons, and your browser's width and height. Additionally, we may collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, access times, and referring website addresses.

When using the Services, we may use automated technologies to collect information relating to your device, including your device IP address, device identifiers, the type and characteristics of your device, and language preferences.

You may be able to control the settings of your device or browser to stop accepting all or certain types of cookies, or to prompt you before accepting a cookie from the websites you visit. If you set your device or browser to reject cookies, parts of our Services may not work for you. Please note, depending on your type of device or browser, it may not be possible to delete or disable all tracking mechanisms on your device. Your selection of the "Do Not Track" option provided by your device or browser may not have any effect on our collection of cookie information for analytic and internal purposes. You may actively manage the settings on your device and/or browser to delete and disable cookies and other tracking/recording tools. To learn more about cookies, beacons and related tracking technologies, visit [allaboutcookies.org](http://allaboutcookies.org).

The information we obtain using these automated technologies helps us remember your information so you will not have to re-enter it; track and understand how you use and interact with our Services; tailor our Services around your preferences; measure the usability of our Services and the effectiveness of our communications; and otherwise manage and enhance our Services, including to help ensure they are working properly.

## **HOW WE USE YOUR PERSONAL INFORMATION**

We may use the personal information we obtain to:

- Provide, develop, evaluate, manage and improve the Services;
- Establish and maintain your account;
- Identify and authenticate you through log-in processes, so you may access and use certain of the Services, and access certain content;
- Process and fulfill orders in connection with the Services, and to keep you informed about the status of your orders;
- Personalize your experience with the Services;
- Allow you to stream, download and save content;
- Market, promote and provide other information regarding our Services and other offerings (including to send you information about our products, services and other offerings that we think may be of interest to you);
- Communicate with you (including to provide you information and other communications about your orders and our Services);
- Use information processed through HVA Products to develop our artificial intelligence ("AI") products to improve the Services for you;
- Provide customer support;
- Allow you to interact with third-party products or services, where available and applicable;
- Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities;
- Perform analytics (including market and consumer research, trend analyses, etc.); and
- Comply with and enforce applicable legal requirements, relevant industry standards and policies, including this Privacy Policy and our terms of service or other terms applicable to your use of the Services.

We may also use your information in an aggregated, non-identified form for research purposes and to help us make sales, marketing, and business decisions.

We also may use the personal information we collect about you in other ways for which we provide specific notice at the time of collection and obtain your consent if required by applicable law.

In order to offer you a more consistent and personalized experience in your interactions with us, information collected through one service or method may be combined with information obtained through other services and/or methods. We may also supplement the information we collect with information obtained from other sources. For example, we may use services from other companies that enable us to derive a general geographic area based on your IP address in order to customize certain services to your geographic area.

## **HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

Except as described in this Privacy Policy or terms applicable to the Services, we will not disclose your personal information outside of HVA without your consent or in connection with a separate agreement.

We may disclose your personal information to our service providers and similar third parties to provide limited services on our behalf, such as handling the processing and delivery of mailings, providing customer support, hosting the Services, processing transactions and payments, managing our relationship with

customers, and performing statistical analysis regarding your and other users' use of the Services. We also may disclose personal information to our business partners with whom we jointly offer products and services, and to the extent you connect to third-party products or services within or through our Services. Those service providers and business partners to whom we disclose your information will be permitted to obtain only the personal information they need to deliver the services they perform for us or to otherwise cooperate or work with us. They are also required to maintain the confidentiality of the information and are generally prohibited from using it for any other purpose. However, some of our service providers and business partners may use anonymized and/or aggregated data to improve or otherwise support their services. For example, with regard to credit card processing services, our fraud detection service providers may use aggregate data to help them more accurately detect fraudulent uses of credit cards.

We may access or disclose your personal information, including the content of your communications: (a) to comply with the law or legal process (such as a subpoena), or to respond to lawful requests of government agencies; (b) to establish, exercise or defend our legal rights; (c) in connection with an investigation of suspected or actual illegal activity; (d) to protect the rights or property of HVA or our customers, including the enforcement of our agreements or policies governing your use of the services; (e) acting on a good faith belief that such access or disclosure is necessary to protect the personal safety of HVA's employees, customers, or the public; (f) as part of a corporate transaction such as a merger or sale of assets, in which case, your information (including your personal information) may be shared, sold, or transferred, and it may be used subsequently by a third party, provided, that this Privacy Policy will continue to apply unless and until the surviving entity or transferee changes it in compliance with its terms; or (g) otherwise with your consent.

## **SECURITY OF YOUR PERSONAL INFORMATION**

HVA is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. Nevertheless, no method of transmission over the Internet or method of electronic data storage is 100% secure. Consequently, while HVA strives to use commercially reasonable means to protect your information, we cannot guarantee its absolute security. We remind you always to exercise discretion when you share information over the Internet.

If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. Do not share your password with anyone. If you are sharing a computer with anyone, you should always log out before leaving a site or service to protect access to your information from subsequent users.

## **RETENTION OF PERSONAL INFORMATION AND DATA**

HVA will store your personal information and data in accordance with applicable laws or regulatory requirements and retain data only for as long as necessary to fulfill the purposes for which the personal information and data was collected unless otherwise permitted by law. When determining the retention period, we take into account criteria, such as the type of services requested by or provided to you, the nature and length of our relationship with you, use of our Services, and the impact on the Services functionality if we delete your personal information. In general, personal information is by default erased (or anonymized) by HVA after termination of the customer relationship, with the exception of certain types

of personal information, which may be stored for an extended period of time due to administrative purposes, where such personal information must be retained to comply with regulatory requirements.

## **COLLECTION AND USE OF CHILDREN'S PERSONAL INFORMATION**

HVA is committed to protecting the privacy needs of children and we encourage parents and guardians to take an active role in their children's online activities. We do not target our Services to children less than eighteen (18) years of age, nor do we knowingly collect information from such children for the purpose of selling products or Services. If we learn we have collected or received personal information from a child under eighteen (18) years of age without verification of parental consent, we will delete that information. If you believe we may have received personal information from a child less than eighteen (18) years of age, please contact us immediately at our contact information listed in the "Contact Us" section below.

## **LINKS TO OTHER WEBSITES**

The Services may contain links to other websites or services that are not owned or controlled by HVA. Please be aware that we are not responsible for the privacy policies or statements, or terms of use or service, for such third-party websites. We encourage you to be aware when you leave our websites or Services and to read the applicable privacy policies and terms of use for any third-party websites you may visit or third-party services you may use.

## **INTERNATIONAL VISITORS TO OUR SITES**

The Services are intended for users in the United States and Canada only. The servers that make our Services available are located in the United States. If you are a non-resident of the United States, do not use the Services or provide us with any of your personal information.

## **YOUR CHOICES REGARDING YOUR PERSONAL INFORMATION**

### **Accessing And Editing Your Personal Information**

You may have the ability to view or edit your personal information via the Services. In order to help prevent your personal information from being viewed by others, you will be required to sign in to your account (if any) with your credentials (User ID and/or e-mail address, and password). You may also contact us [at](#) our contact information listed in the "Contact Us" section below.

### **Communication Preferences**

You can stop the delivery of future promotional materials from us by following the specific instructions in the materials you receive (e.g., by clicking the "Unsubscribe" or "Safe Unsubscribe" links at the bottom of the message).

This choice does not apply to the receipt of transactional communications or mandatory service communications that are considered part of certain Services, which you may receive periodically unless you cancel the Service.

## SPECIFIC DISCLOSURES FOR CALIFORNIA RESIDENTS

California Consumer Privacy Act, as amended by the California Privacy Rights Act (Civil Code Section 1798.100, et seq.) ("California Law"), grants rights within connection with your personal information. These rights and how to exercise them is described below.

- Right to Know. The right to request that we disclose certain information to you about our collection and use of your personal information.
- Right to Delete. The right to request that we delete any of your personal information that we collected from you and retained, unless an exception under California Law applies. For example, the information may be excluded or not constitute personal information under California Law or we may also deny your deletion request if the personal information is required to complete the transaction for which the information was collected or to provide you with requested goods or services.
- Right to Correct Inaccurate Personal Information. The right to request that we correct any of your personal information that we maintain about you.
- Right to Opt Out of Sales or Sharing of Personal Information. We do not sell your personal information for monetary profit. However, we may engage in certain information disclosure activities that may be considered "sales" or "sharing" under California Law. If we sell your personal information to or share such information with third parties, you may have the right to opt-out of the sale or sharing of such information. To exercise the right to opt out, you (or your authorized representative) may submit a request to us by contacting [support@hanwhasecurity.com](mailto:support@hanwhasecurity.com).
- Right to Limit the Use of Sensitive Personal Information: We do not use sensitive information about you.
- We will not discriminate against you in the event you exercise any of the aforementioned rights under state laws.

As described at the beginning of this Privacy Policy, we may process personal information for our End Customers or other third parties. To this end, if not stated otherwise in this Privacy Policy, we process such personal information as a processor on behalf of our End Customers (and its affiliates) or other third parties who are the controller of the personal information. We are not responsible for and have no control over the privacy and data security practices of our End Customers or other third parties, which may differ from those explained in this Privacy Policy.

Individuals whose personal information has been submitted to us in our role as a processor by or on behalf of an End Customer and wish to exercise any rights they may have under applicable data protection laws, will be directed to the End Customer.

To submit a privacy rights request, or designate an authorized agent to make a permitted request under an applicable state law on your behalf, please contact us using the contact information listed in the "Contacting Us" section below.

To verify your or your authorized agent's identity when you submit a request, we will match the identifying information you provide us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account. Please note that HVA may request specific information from you to enable HVA to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. Requests will typically be honored within forty-five (45) days or less, but may take up to ninety (90) days based on the results of verification. Note that certain state laws may limit the number of certain types of requests that you may make within a 12-month period.

### **Additional Information for California Residents**

As required under California law, we are making the following disclosures regarding the collection, use, and disclosure of personal information.

<b><u>Category of Personal Information</u></b>	<b><u>Category of Source from which Data is Collected</u></b>	<b><u>Purpose of Collection</u></b>	<b><u>Category of Third Parties to whom Data is Disclosed</u></b>
Identifiers, such as name, e-mail address, phone number, mailing address, IP address and account log-in information	Directly from users	To provide the Services; to process your orders, requests, and other inquiries; to support our electronic and digital programs	Service Providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code §1798.80(e)), such as credit card number, billing address and other financial information	Directly from users	To process and fulfill your orders	Service Providers
Commercial information, such as order information, history, and tendencies	Directly from users	To provide the Services; to process your orders, requests, and other inquiries; to support our electronic and digital programs	Service Providers



Biometric information, such as facial characteristics (if explicitly consented to and determined by our customers)	Indirectly by end customers use of the Services	To provide the Services	Service Providers
Internet or network activity information, such as usage information, device type, and browser type	Cookies and other automated tracking technologies	To support our electronic and digital programs; for data analysis, audits, security and fraud monitoring and prevention; for developing new products and services; for enhancing, improving or modifying our Services; for identifying usage trends and determining the effectiveness of our promotional campaigns; for operating and expanding our business activities	Service Providers
Geolocation data, such as device location	Directly from users; cookies and other tracking technologies	To provide the Services; to support our electronic and digital programs; to personalize the Services according to your personal preferences	Service Providers
Sensory data, such as visual information	Directly from users	To provide the Services	Service Providers
Inferences, such as interests, preferences, and activities	Directly from users; cookies and other tracking technologies	To personalize the Services according to your personal preferences; to support our electronic and digital programs; for developing new products and services; for enhancing, improving or modifying our Services; for identifying usage trends and determining the effectiveness of our service promotions; for operating and expanding our business activities	Service Providers

Sale and Sharing of Personal Information. We do not sell your personal information for monetary profit. However, we engage in certain information disclosure activities that may be considered “sales” or “sharing” under California Law. In the last 12 months, we have sold or shared identifiers and internet or other similar network activity to advertisers and/or advertising networks to provide you with personalized advertising and content. We do not knowingly sell or share the personal information of consumers under 16 years of age.

### **Canadian Privacy Rights**

If you are located in Canada, the *Personal Information Protection and Electronic Documents Act* and applicable provincial privacy legislation (collectively, “**Canadian Privacy Laws**”) govern the collection, use and disclosure of personal information by organizations in the course of commercial activities. If you are located in Canada, this Canada Privacy Rights section applies to you. Additionally, in certain Canadian provinces, provincial privacy legislation will apply to you, namely, for the Province of Alberta - the *Personal Information Protection Act* (Alberta), for the Province of British Columbia - the *Personal Information Protection Act* (British Columbia) and for the Province of Quebec - the *Act respecting the protection of personal information in the private sector* also applies to you and the expression “Canadian Privacy Laws” therefore also includes reference to these provincial laws. If you live in Canada and any part of our general Privacy Policy conflicts with this Canadian Privacy Rights section, this Canadian Privacy Rights section governs to the extent of the conflict.

#### Personal Information

Under Canadian Privacy Laws, personal information means any information about an identifiable individual, which may, in certain circumstances, include information gathered from your use of the Services.

#### Consent

In Canada, express or implied consent is the legal basis upon which organizations may collect, use and disclose personal Information. Accordingly, personal information will only be collected, used, and disclosed by us for the purposes described above in this Privacy Policy under the heading “How We Use Your Personal Information”, with your express or implied consent. We will collect your express consent for any sensitive personal information that we may collect, use, or disclose. Otherwise, your continued use of the Services signifies your consent to our collection, use, and disclosure of your personal information as described in this Privacy Policy, as it may be amended from time to time after you have been informed of any such amendment. Your continued use of the Services after having been informed of any amendment to this Privacy Policy will be deemed a consent by you to any such amendment; if you do not agree with this Privacy Policy or any amendment, do not access the Services.

If you provide personal information of a third party to us, you represent that you have complied with the requirements of Canada Privacy Laws with regards to its collection before providing it to us and for us its use and disclosure as set out in this Privacy Policy.

#### Online Behavioural Advertising

With respect to the information that we collect using cookies or similar technologies that we have described above, you can opt-out of several third party ad servers' and networks' cookies simultaneously by using an opt-out tool created by the [Digital Advertising Alliance of Canada](https://youradchoices.ca/en/tools) (<https://youradchoices.ca/en/tools>) and an opt-out tool created by the [Network Advertising Initiative](https://optout.networkadvertising.org/?c=1) (<https://optout.networkadvertising.org/?c=1>).

Opting out of a network does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

## **Your Rights**

### *Withdrawal of Consent*

Under Canadian Privacy Laws, you have the opportunity to withdraw your consent at any time to our collection, use or disclosure of your personal information, subject to reasonable prior notice and applicable legal and contractual restrictions. Depending on the nature of the personal information for which you choose to withdraw your consent, if you do withdraw your consent we may not be able to provide our products and services to you; we will explain the implications of withdrawing consent to you when we receive your notice of withdrawal. If you withdraw your consent in respect of any personal information that has been provided to third parties, we will advise such third parties of your withdrawal to the extent required by Canadian Privacy Laws.

### *Right to be informed*

You have the right to be information about the personal information that we collect, use, process, disclose, retain and have deleted about you. You may request additional information to clarify the extent of your consent.

### *Right to an Accounting*

You have the right to receive an accounting of the categories of third parties to whom we have disclosed your personal information.

### *Rights of Access, Correction*

You have the right to access the personal information we maintain about you and you have the right to correct or supplement your personal information if it is inaccurate or misleading and to have it completed if it is incomplete. Where appropriate, to have personal information that you have corrected or supplemented transmitted to third parties who have had access to your personal information.

### *Right to be notified of a Data Breach*

If you are in Quebec, you have the right to be informed of a confidentiality breach involving your personal information that may cause you a serious harm. If you are in the rest of Canada, you have the right to be informed of a breach of security safeguards affecting your personal information where there is a real risk of significant harm to you.

### *Right to Lodge Complaints*

You have the right to lodge a complaint about our collection, use or disclosure of your personal information with the Office of the Privacy Commissioner of Canada and any applicable provincial privacy commissioner's office having jurisdiction.

## **Additional Rights in Quebec**

If you are in the province of Quebec, you have the following additional rights:

#### *Right of Deletion*

You may request under certain circumstances the deletion of your personal information.

#### *Right to Data Portability*

As of September 22, 2024 you will have the right to be provided, in a structured, commonly used and machine-readable format, with a copy of your personal information or to have it transferred directly to another entity or person.

To exercise the above rights, please get in touch with us using the contact information provided below under the heading "Contact Us". We will consider and process your request within a reasonable period of time and in any event within thirty days of receipt of your request or such longer time as we may be permitted under Canadian Privacy Laws. Please be aware that under certain circumstances, Canadian Privacy Laws may limit your exercise of these rights.

If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

If we refuse to rectify your personal information, we will attach a statement to the record that sets out the reason why we have refused to make the rectification.

We will also retain the personal information that has been the subject of an access request or a rectification request for as long as necessary to allow you to exhaust any recourse provided by law.

#### *International Transfers*

As noted above in this Privacy Policy, your personal information may be transferred to and stored at a location outside of your jurisdiction of residence. Please note that local data protection laws where your personal information is stored or processed may not provide as much protection as the data protection laws in force in your jurisdiction of residence, but we nevertheless ensure that we take reasonable steps to ensure that your personal information will not be used by such persons storing or processing the information for any purpose other than assisting us for the purposes described in this Privacy Policy. If you would like to receive more information about our policies and practices with respect to our use of service providers outside of Canada who handle your personal information or if you have any questions about our collection, use, disclosure or storage by any service providers outside of Canada on our behalf, please contact us at the address below under the heading "Contact Us".

If you provide personal information of a third party to us, you represent that you have complied all the obligations imposed by Canada Privacy Laws regarding the transfer of personal information outside the jurisdiction of residence.

#### *Business Transfers*

Where we disclose your personal information in the event of a business transfer described in our Privacy Policy above, we will ensure that the information is treated confidentially by the parties to the transaction and that the information will be protected by security safeguards appropriate to its sensitivity. If the transfer

is completed, we will require that the parties to the transaction continue to treat your personal information in accordance with Canadian Privacy Laws.

#### Service providers

Where we disclose personal information to services providers, we ensure that they are bound by contractual obligations to:

- Use personal information only for providing the service;
- Refrain from disclosing or communicating personal information without our consent;
- Implement rigorous security measures;
- Allow us to audit these measures;
- Notify us immediately of a confidentiality breach; and
- Destroy personal information at the end of the contract.

#### Electronic Marketing Messages

We send electronic marketing messages for the purposes described above in this Policy, however, notwithstanding Our Opt-in/Opt-out Policy described above, Canada's anti-spam legislation contains special rules that regulate the way in which we may send these electronic messages to you. If you are located in Canada we will only send electronic marketing messages to you if we have your prior opt-in consent, unless an exception or a specific form of implied consent applies. You may learn more and sign up for our electronic mailing list by emailing [support@hanwhasecurity.com](mailto:support@hanwhasecurity.com).

#### Information security and governance

Our internal policies and practices provide for:

- framework applicable to the use, communication, retention and destruction of personal information;
- the roles and responsibilities of our employees throughout the life cycle of the personal information; and
- a process for handling complaints concerning the protection of personal information.

Each of employee who uses personal information is bound by confidentiality obligations and has received appropriate training. In addition, each employee may only access personal information that is necessary for the performance of his or her duties. In the event of a breach, our governance policies and practices provide for sanctions.

### **CHANGES TO THIS PRIVACY POLICY**

Please note that this Privacy Policy may change from time to time. We will provide you with notice of any changes by posting the updated version of the Privacy Policy on our Services, by contacting you at the e-mail address that we have on file for you (if any), or by any other reasonable means. Your continued use of the Services following the effective date of any change signifies your assent to the updated Privacy Policy.

We encourage you to periodically review this Privacy Policy to be informed of how we are collecting, using, sharing and protecting your information.

### **CONTACT US**

HVA welcomes your comments regarding this Privacy Policy or the Services generally. If you have questions about this Privacy Policy, or if you have a technical or general support question, please contact us by phone at 1-877-213-1222 or by e-mail at [support@hanwhasecurity.com](mailto:support@hanwhasecurity.com).

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