

Zumtobel Group IoT Privacy Statement

With the onset of a new era of lighting – the Internet of Lighting – luminaires are connected and may serve as data collection and communication devices, providing the backbone for the Internet of Things. To ensure the highest standards of data protection, we commit ourselves to a clear privacy statement.

As Zumtobel Group, we employ the lighting hardware infrastructure in combination with our open service enablement platform to provide additional data-driven services and thus enable the Internet of Lighting. Data is collected via various types of sensors, processed, stored and, if necessary, shared with selected third-party providers to offer such services to our customers.

This privacy statement builds on top of the related Zumtobel Group IoT Security Statement and applies to all connected solutions by our brands Thorn, Zumtobel, Tridonic, acdc and Reiss and explains

- the roles of the different stakeholders,
- the information we collect,
- why we collect it,
- processing upon collection, as well as
- the use of that information.

Definition of personal data/privacy

Personal data is any information relating to an identified or identifiable natural person. It enjoys particular protection due to the Data Protection Directive of the European Union (95/46/EC) and its respective national implementations. We adhere to these regulations by use of data aggregation and data minimization in our offerings. Without explicit consent, no personal data is ever collected and/or linked to personal data.

Stakeholders and definition of roles

Our solution affects at least four different types of stakeholders (Fig. 1):

- User
- Customer
- Platform provider (Zumtobel Group)
- Third-party service providers

The user may be a natural or legal person that enjoys a direct or indirect benefit from our service offering. Our customer is typically a legal entity that collects and controls the use of data from the user. He also selects the set of desired services from a pool of services offered. As a platform provider, the Zumtobel Group offers an open service enablement platform facilitating a variety of data-driven services. Third-party service providers leverage the platform to provide their specific services.

From a data protection point of view, the customer retains the role of the data controller, while the platform provider acts as a processor and the third-party service providers act as subprocessors. Importantly, this relationship ensures that data ownership stays with the controller.

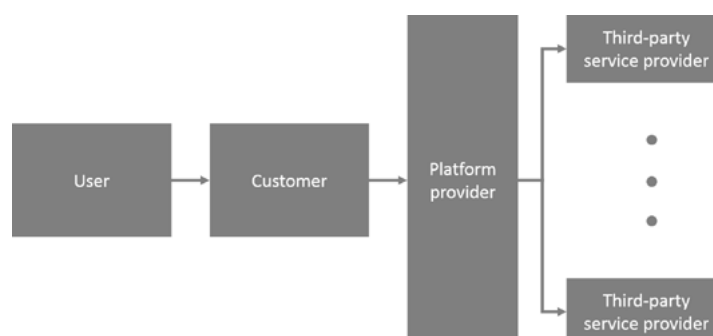


Fig. 1: The data flow between different stakeholders

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Sharing of data

We never share data with third-parties, unless (i) the user has explicitly given his consent, (ii) we have been expressly instructed by the data controller and (iii) sharing is necessary to provide the desired service. In case of dissent, the corresponding service cannot be provided. Data access to third-parties can be revoked at any time by the data controller. We do reserve the right to plug service offerings, designed by third parties, directly into the platform. This does not require additional consent as no data is shared with third parties.

Computation takes place on the platform, hence all input and output data remain on the platform. When sharing data, we also oblige the subcontractor to use this data only according to our instructions and for the specified purpose and to remove all data after the purpose has been achieved. Furthermore, we explicitly prohibit further data sharing without further agreements.

Data security

We are committed to protecting the security of data entrusted to us as a data processor. We use a variety of security technologies and procedures to protect this data from unauthorized access, use or disclosure. The related Zumtobel Group IoT Security Statement provides a more detailed overview of the security measures in place.

Data storage

We store all data within the European Union or with partners that have agreed to adhere to our data protection standards and all relevant data protection regulations (e.g., the European Commission's standard contract clauses). Raw data is only stored as long as necessary for providing the desired service and then removed from our systems.

Changes to this statement

This statement is publicly available on our website. We inform our customers in advance to any substantial changes to this statement.

THORN

TRIDONIC

 ZUMTOBEL

acdc

REISS