

ECOTHING Privacy Statement

Updated on : 07/02/2025

ECOTHING INC. (hereinafter "ECOTHING" or "we"), whose registered office is located at Third Floor, Century Yard, Cricket Square, P.O. Box 902, Grand Cayman, KY1-1103, Cayman Islands, is committed to respecting your privacy and ensuring the protection of your personal data when you use the sites, applications and other media for which ECOTHING is responsible. ECOTHING undertakes to ensure adequate protection of personal data that it may be required to process, pursuant to the purposes specified hereinafter.

This ECOTHING Privacy Statement (hereinafter the "Privacy Statement") applies to the processing of personal data collected through the following websites (hereinafter the "Websites"):

ECOTHING Portal (<https://www.conow.com/>)

This Privacy Statement must be read in conjunction with the ECOTHING Terms of Use (the "Terms"). Unless otherwise stated, all other capitalised terms contained in this Privacy Statement shall have the meaning given to it in the Terms. In this Privacy Statement, "we", "us" or "our" refers collectively to the ECOTHING.

1. The purpose of this Privacy Statement is to inform you of how we collect, use, disclose and process the following data and information:

- 1.1 data and personal data relating to you;
- 1.2 information associated with your Account (including but not limited to ECOTHING, ECOTHING app or Account activity or interaction data); and
- 1.3 data and personal data that may relate to a third party individual and is provided by you(collectively, "**Data**").

Types of Data that we collect and Purposes

2. We may request certain types of Data from you in connection with your Use of ECOTHING and ECOTHING Materials. Examples of the types of Data which we may request and collect include, but are not limited to:

Purposes	Data Processed
<i>ECOTHING Portal</i>	
Business inquiry contact information	- Company Name - Contact Person - Business Email - Work Phone Number - Country/Region - Topic and details of the inquiry provided by the developer
information from your IoT Device	IP address, MAC address, network interfaces, device

	type and model, and other forms of data
information from your endpoints Device	device model, operating system and system language.
<i>Common purposes to all ticketing Websites and Application</i>	
Email and push notifications	- Email address - Mobile phone number
Reports and Statistics	- Technical logs, browsing activity information
Customer care (Webform)	- Identification data (title, surname, Last name, Contact information, E-mail address) - Company name - Topic and details of the inquiry provided by the user
Data subject right management	- Data subject request - Identification information: full name - Contact information: email address - Documentary evidence of the data subject identity

3. We may collect the Data through various technologies including but not limited to:

3.1 Cookies: Cookies are small data files which are sent to your browser or Device to store and track information about you when you Use ECOTHING and ECOTHING Materials. Cookies are also used to improve and maintain the functionality of ECOTHING and ECOTHING Materials, and to track information such as user's inquiry content, user's configuration, language, security configuration information. While these cookies can tell us when you Use ECOTHING and ECOTHING Materials, they cannot read data off your hard disk.

3.2 Server Logs: Server logs are files and records of activity created by the Device that you Use ECOTHING or ECOTHING Materials from. For example, a web server log may record a history of page requests whereas other logs may record errors, access attempts or other information about your Device, such as your IP address or your Device's cookie settings. We collect and retain such server logs for administrative, security and troubleshooting purposes.

4. Data collected from you may be used, disclosed and processed by us for any, some or all of the following purposes:

4.1 to assist, process and facilitate your Use of ECOTHING and ECOTHING Materials, including creating your Account, facilitating your login into your Account and your use of any features or functionalities of ECOTHING and ECOTHING Materials ;

4.2 to carry out your instructions or respond to any queries, feedback or complaints provided by (or purported to be provided by) you or on your behalf, or otherwise for the purposes of responding to or dealing with your interactions with us;

4.3 for the purposes of storing or creating backups of your Data for contingency or business continuity purposes;

4.4 to prevent or investigate any fraud, unlawful or criminal activity or omission or misconduct, or cybersecurity incident, via the use of your Account, whether or not there is any suspicion of the aforementioned, even if the disclosure of such Data may be potentially incriminating;

4.5 to deal with conflict of interests or investigate complaints in relation to your Account;

4.6 to pre-fill any e-form, user registration page or screen on any Approved Recipient's Channel(s) with your Profile Data;

4.7 to contact you or communicate with you on any matters relating to your Use of ECOTHING and ECOTHING Materials, including but not limited to the purposes set out above, via email, push notifications or such other forms of communication that we may introduce from time to time depending on the functionality of ECOTHING and ECOTHING Materials and your Device; and

4.8 for any other purpose(s) that do not appear above where permissible under any written law (collectively, the "**Purposes**").

5. With regard to Data provided by you or which we have collected as part of the provision of ECOTHING or its features or functionalities:

5.1 unless prohibited by written law, we may share, transfer and disclose Data with any of the following third parties:

- third parties approved by us to use ECOTHING and its features or functionalities (such as Approved Service Providers);
- relevant third party service providers in connection with the provision of ECOTHING and ECOTHING Materials;
- law enforcement authorities, investigative bodies, regulatory bodies;
- Public Agencies.

5.2 for your convenience, we may also display to you Data you had previously supplied us. This will speed up the transaction(s) and save you the trouble of repeating previous submissions. Should such displayed Data be out-of-date, you shall be required to supply the latest Data through the relevant functionality in ECOTHING without delay.

Data of third party individuals

6. In the course of your Use of ECOTHING or ECOTHING Materials, you may provide or we may collect Data relating to other individuals from you.

6.1 You shall, prior to disclosing to us such Data relating to other individuals:

- notify these individuals (i) that you will be providing their data or personal data to us or through your Use of ECOTHING or its features or functionalities; and (ii) of the Purposes for which we will be collecting, using, disclosing and processing their data or personal data, as set out in this Privacy Statement and as notified by us to you from time to time; and
- obtain the consent from the individuals whose data or personal data are being disclosed, permitting (i) you to disclose the personal data to us or through your Use of ECOTHING or its features or functionalities; and (ii) us to collect, use, disclose and process these individuals' personal data, for the Purposes.

6.2 You represent and warrant that:

- the data or personal data that you will be providing us or have provided us is, complete, accurate, true and correct; and
- you have the valid authority and consent from these individuals to act on their behalf and provide their data or personal data to us to collect, use, disclose and process for the Purposes.

How we handle and manage your Data

7. Your Data may be stored in servers, systems or devices owned, operated or managed by us, a relevant Third Party or any third party service provider engaged by us or a relevant Third Party, or on your Device, and may be used by us (or our third party service providers) and Approved Service Providers to facilitate your Use of ECOTHING or ECOTHING Materials.

8. You may withdraw your consent to the use and disclosure of Data by us with reasonable notice; however, doing so may prevent proper Use of ECOTHING or ECOTHING Materials, or any part thereof and may also result in the cessation of your Use of ECOTHING or ECOTHING Materials, or any part thereof. We may retain, use, disclose and process your Data for any of the Purposes set out herein where permitted under any applicable law.

To exercise your rights

9. You have the following rights over your personal data:

- Right of access: Obtain confirmation whether data concerning you is being processed and, if so, access to that data along with additional information about the processing.
- Right of rectification: Correct inaccurate or outdated data.
- Right to erasure: Request the deletion of certain personal data in specific cases.
- Right to restriction: Restrict processing in certain situations.
- Right to object: Object to the processing of your data for reasons related to your specific situation or, independently of your situation, for direct marketing purposes.
- Right to withdraw consent: Withdraw your consent at any time without affecting the lawfulness of processing based on your consent.
- Right to data portability: Receive the data you provided to ECOTHING and/or request ECOTHING to transmit it to another data controller if the processing is based on your consent or a contract and is automated.

In accordance with its legal obligations, ECOTHING has officially appointed a Data Protection Officer (DPO) . You can contact the DPO via email for additional information about data processing or to exercise your rights at privacy@ECOTHING.com. If necessary, the DPO team may ask you to provide a document proving your identity to legitimize your request.

Changes to Privacy Statement

10. We reserve the right to change, modify or supplement the Privacy Statement at our discretion and at any time, by posting the changed, modified or supplemented Privacy Statement on or through the ECOTHING Website, ECOTHING app, or through such other means as we may deem appropriate. Your continued Use of ECOTHING and ECOTHING Materials following the posting of any change, modification or supplement will constitute your acceptance of such change, modification or supplement. If you do not agree to any change, modification or supplement to the Privacy Statement, please do not Use ECOTHING or ECOTHING Materials.

Version History

Date of Changes	Summary of Key Changes
12 September 2024	First release.