

Moeoco IOT INC.

Privacy Policy

Last update: May 5, 2022

Moeoco IOT INC., a Delaware corporation ("Moeoco," "we" or "us") is committed to respecting and protecting your privacy. This privacy policy applies to all individuals who access Moeoco's website and mobile applications (collectively, the "Services") or otherwise interact with us. This privacy policy describes the personal information we collect and how that personal information may be used, maintained and, in some cases, shared.

Our privacy policy applies to any User, Invited User, or Client

"Personal information" includes any information that enables us to identify you, directly or indirectly, by reference to any identifiers such as name, identification number, location data, online identifier or one or more factors specific to you. Moeoco is the "**controller**" and is responsible for deciding how personal information is used. Moeoco can also be the "**processor**" in regard to the Invited Users where the controller is our Client.

It is important that you read this privacy policy together with any other privacy policy or notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This privacy policy supplements any other privacy policy or notices we may provide and is not intended to override them.

By using or accessing the Sites and/or Services, or by providing personal information to us on or through the Services or otherwise, you acknowledge that you have read and understood the policies and procedures described in this privacy policy. If you have any questions or concerns about this privacy policy, please contact us at hello@moeoco.io.

WHAT INFORMATION DO WE COLLECT?

The data we collect and/or process is divided into two categories: automatically collected information and information that you provide to us.

Automatically Collected Information:

We automatically collect certain information when you access or use the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Services and other technical information. This information is primarily needed to maintain the security and operation of the Services, and for our internal analytics and reporting purposes.

We also collect information through cookies and similar technologies. You can find out more about this in our Cookie Policy.

Automatically collected information includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage and performance information our servers automatically collect when you access or use the Services and which we record in log files. Depending on how you interact with us, this log

data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports, and hardware settings).

- *Device Data.* We collect device data such as information about your computer, phone, tablet or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system and system configuration information.
- *Location Data.* We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address).

Personal Information You Provide Us:

We collect personal information that you voluntarily provide to us when you register with the Services, express an interest in obtaining information about us or our products and Services, or otherwise when you contact us. The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make and the products and features you use. The personal information we collect may include the following:

- *Personal Information Provided by You.* We may collect names; phone numbers; email addresses; mailing addresses; job titles; contact preferences; data collected from surveys; usernames; passwords; contact or authentication data; information you provide when using our products (e.g., business name, business email, business address, business fax, company website, etc.); number of unique views and total number of visitors when you deploy your cookie banner using our consent management solution; information in blog comments; financial information (e.g., last four digits of your debit or credit card number, billing history, billing address, card type, issuing bank, expiration date, card origin by country); profile photo; and other similar information.
- *Payment Data.* We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument.

PLEASE NOTE that we do not knowingly collect the Personal Data of Users under the age of 18 without consent from such User's legal representative(s). By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any Personal Information, we may have collected from Users under the age of 18, please contact us immediately at hello@moeco.io.

HOW DO WE USE YOUR INFORMATION?

We use personal information collected via the Services for a variety of business purposes described below. We process your Personal Information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your

consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- *To facilitate account creation and logon process.* If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- *To manage user accounts.* We may use your information for the purposes of managing our account and keeping it in working order.
- *To request feedback.* We may use your information to request feedback and to contact you about your use of the Services.
- *To protect the Services.* We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.
- *To respond to legal requests.* If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- *To fulfill and manage your orders.* We may use your information to fulfill and manage your orders, payments, upgrades, or refunds made through the Services.
- *To deliver and facilitate delivery of the Services.* We may use your information to provide you with the requested services.
- *To respond to user inquiries/offer support to you.* We may use your Personal Information to respond to your inquiries and solve any potential issues you might have with the use of the Services.
- *To send you marketing and promotional communications.* We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences.
- *To transmit administrative information to you.* We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- *For other business purposes.* We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve the Services, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

DO WE SHARE YOUR INFORMATION WITH OTHER PARTIES?

We may process or share your data that we hold based on the following legal basis:

- *Consent.* We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- *Legitimate Interests.* We may process your data when it is reasonably necessary to achieve our legitimate business interests.

- *Performance of a Contract.* Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- *Legal Obligations.* We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- *Vital Interests.* We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

In particular, we may need to process your data or share your personal information in the following situations:

- *Business Transfers.* We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- *Vendors, Consultants and Other Third-Party Service Providers.* We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. For example: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with the Services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.
- *Affiliates.* We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your Personal Information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). As a general rule we do not keep Personal Information for longer than 24 months after you cease the use of the Services.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

If you want to disable cookies, then you can find instructions for managing your browser settings at these links:

- [Internet Explorer](#)
- [Firefox](#)
- [Safari](#)
- [Microsoft Edge](#)
- [Chrome](#)
- [Opera](#)
- [Vivaldi](#)

DO WE TRANSFER PERSONAL INFORMATION INTERNATIONALLY?

The Personal Data we collect is stored on servers in Germany and Finland. To facilitate our global operations, we transfer information collected globally for the purposes described in this policy.

If your information was collected in the European Union or you are an individual resident in the European Union, we will take steps to ensure that the information receives the same level of protection as if it remained within the European Union – in particular:

- when we share information among our affiliates, we make use of [standard contractual data protection clauses](#); and
- when we share data with other third parties, we either ensure the importer is Privacy Shield compliant, make use of the [standard contractual data protection clauses](#) or put in place other appropriate legal mechanisms to safeguard the transfer.

As an individual resident in the European Union, you have a right to receive details of any safeguards that we have where your data is transferred outside the European Union, (e.g., to request a copy where the safeguard is documented, which may be redacted to ensure confidentiality).

NOTICE TO EUROPEAN USERS:

The information provided in this section applies only to individuals in the European Economic Area, United Kingdom and Switzerland (collectively, “**Europe**”) and explains our practices regarding personal information that we collect from you or which we have obtained about you from a third party and the legal basis for processing for your personal information. It also sets out your rights in respect of our processing of your personal information.

- *Personal information.* References to “personal information” in this Notice to European Users are equivalent to “personal data” governed by the General Data Protection Regulation (GDPR).
- *Controller or Processor.* We may be either the controller or processor of your personal information covered by this privacy policy.
- *EU representative.* Our EU representative’s details can be obtained by emailing hello@moe.co.io.
- *Legal basis for processing.* The legal bases of our processing of your personal information as described in this privacy policy will depend on the type of personal

information and the specific context in which we process it. However, the legal bases we typically rely on are set out in the table below. We use your Personal Information only as permitted by law. Our legal basis for processing the personal information described in this privacy policy are described in the table below:

Processing purpose	Legal basis
Service Delivery	Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the Services you access and request.
<ul style="list-style-type: none">• Communications• Research and Development• Marketing and Advertising• Compliance and Protection• As otherwise described in this privacy policy	These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
Compliance and Protection	Processing is necessary to comply with our legal obligations.
With your consent	Processing is based on your consent. Where we rely on your consent, you have the right to withdraw it any time in the manner indicated when you consent or in the Services.

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this privacy policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through the Services.

Your rights. You have the following rights in relation to the personal information we hold about you:

- *Right of access.* You can ask us if we are processing your personal information and to provide you with a copy of it (along with certain details). If you require additional copies, we may need to charge a reasonable fee.
- *Right to rectification.* If the personal information we hold about you is inaccurate or incomplete, you are entitled to request to have it rectified.

- *Right to erasure.* You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent to our processing of your personal information (where applicable).
- *Right to restrict processing.* You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information.
- *Right to data portability.* You have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- *Right to object.* You can ask us to stop processing your personal information, and we will do so, if we are:
 - relying on our own or someone else's legitimate interests to process your personal information, unless we can demonstrate compelling legal grounds for the processing; or
 - processing your personal information for direct marketing purposes.
- *Right to withdraw consent.* If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- *Right to lodge a complaint with the supervisory authority.* If you have a concern about any aspect of our privacy practices, including the way we have handled your personal information, you can report it to the relevant supervisory authority (i.e., the Berlin data protection authority) by email at mailbox@datenschutz-berlin.de or by mail at 10969 Berlin, Friedrichstr. 219.

HOW DO WE UPDATE OUR PRIVACY POLICY?

This privacy policy and the relationships falling under its effect are regulated by the GDPR. Existing laws and requirements for the processing of personal data are subject to change. In this case, we will publish a new version of the privacy policy via the Services. If significant material changes are made that affect your privacy and confidentiality, we will notify you by email or display information on the website and ask for your consent.