

WattIQ, Inc. Privacy Policy

Last Updated and Effective Date: April 15, 2024

WattIQ, Inc. ("**WattIQ**", "**we**", "**us**", and "**our**") is committed to respecting the privacy and confidentiality of personal information. Please read this Privacy Policy ("**Privacy Policy**") carefully. It provides information about how WattIQ collects, uses, discloses, and otherwise processes personal information.

By visiting, accessing, or using our Services (defined below), you acknowledge and agree that you have received and reviewed this Privacy Policy. From time to time, we may update this Privacy Policy as described in the [Changes to this Privacy Policy](#) section below.

Please also review the applicable terms that also apply to the use of our Services, including, but not limited to the [Terms of Service](#). Terms that are defined in the Terms of Service have the same meaning in this Privacy Policy unless this Privacy Policy specifies differently.

If you are a resident of Nevada, please see the [Notice to Nevada Residents](#) section below.

If you are a resident of the European Economic Area ("**EEA**"), United Kingdom ("**UK**"), Switzerland, or another non-U.S. country with local data protection laws, please see the [Notice to European and Non-U.S. Residents](#) section below for information about your rights under the applicable local data protection laws.

If you have any questions, comments, or concerns please contact us at any of the methods listed on the [Contact Us](#) section of this Privacy Policy.

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1. Scope of This Privacy Policy

This Privacy Policy applies to personal information that WattIQ collects, uses, discloses, and otherwise processes when you:

- Access or use our website available at wattiq.io or any other website operated or made available by WattIQ where this Privacy Policy is posted (collectively, the “**Website**”);
- Access or use the WattIQ platform and any related products, services or functionality we make available (collectively, the “**Platform**”); or
- Communicate with us through any written, electronic, or oral communications, online or offline, including by email, text message, or phone, as well as interacting with any of our social media pages or marketing communications.
- Interact with us in the context of our internal recruiting efforts, such as by applying for a job with us.

For purposes of this Privacy Policy, we refer to our Website, Platform, and any other online service we provide that links to this Privacy Policy as the “**Services**.”

We provide the Platform to our customers under our agreement with them and solely for their benefit and the benefit of personnel that they authorize to use the Platform (“**Authorized Users**”). We are data processors of the data or other content that our customers and their Authorized Users input, upload, submit or otherwise make available to the Platform and any other data we may process on their behalf (collectively, “**Customer Content**”). Our processing of such data is governed by our agreement with the customer, and the customer is responsible for the collection and use of such Customer Content.

2. Personal Information We Collect and How

As used in this Privacy Policy, “**personal information**” means any information that identifies or could be used to identify an individual person. For example, personal information may include name, email address, and phone number. It also includes other non-public information that we associate with such identifying information. Personal information does not include aggregated or anonymized information.

The personal information we collect and how we collect it depends on how you use the Services. We collect the following types of personal information, as described below.

(a) Information You Provide

We collect personal information that you provide directly to us when you access or use the Services or when you interact with us. We collect information that you provide to us in the following ways:

- i. **Registration and account information.** If you register or create an account to use the Services, WattIQ collects personal information to set up and manage your account, such as your name, company, professional information including job title, department or job role, contact information including email address, postal address, and phone number, account credentials, and any unique account ID associated with the customer account.
- ii. **Payment information.** We collect payment information to process payment for using the Services. This may include billing and other financial information associated with a customer account. .
- iii. **Sales and support requests, inquiries, feedback, questionnaires.** If you contact us, such as by submitting a contact form or sending an email, contacting sales representatives or customer support, or submitting feedback, we collect your name, company, job title, department or job role, email address, phone number, country, the details of your question or request, and any other information you choose to include in your message. We may also collect information you provide if you complete surveys or questionnaires that we make available.
- iv. **Marketing communications and newsletters.** If you subscribe to receive newsletters and marketing communication from us, we will collect your name, contact information, such as your email address, and contact preferences.
- v. **Interactions through social media, and other third-party platforms.** If you interact with us through any third-party platforms, such as Discord or GitHub, or through any of our pages or feeds on social media sites or platforms, such as Facebook or LinkedIn, we may collect information such as your name, username, demographic information, contact information such as email address, location, and publicly-posted data such as your social media activity.
- vi. **Attending Events.** If you sign up for or attend a webinar or other event hosted by WattIQ, we collect registration and attendance information. If you attend a conference, trade show, or other event that WattIQ attends or sponsors, we may collect information about individuals who attend the event and/or information from individuals who interact with us or express an interest in us. This information may include your name and email address as well as any professional background information you may choose to share.
- vii. **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- viii. **Apply for a job or interact with us for our recruiting purposes:** If you submit an application for a job or otherwise interact with us for our internal recruiting purposes, such as by emailing us to inquire about an open job, we collect information such as your name, contact information, which may include email and phone number, resume information, which may include job history and education information, job application information, which includes the job you're applying for and any information you choose to submit with your application, and certain social media profile information, such as your LinkedIn profile information and publicly posted data. WattIQ tries not collect sensitive personal information unless it's necessary to comply with applicable laws. In some circumstances, we may need to collect, or request on a voluntary disclosure basis, some sensitive personal information for legitimate recruiting-related

purposes. For example, information about your racial/ethnic origin, gender and disabilities may be collected for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws and for government reporting obligations. Information about your physical or mental condition may be collected in order to consider accommodations we need to make for the recruitment process and/or subsequent job role.

You may choose not to provide personal information directly to us or to not use the Services. However, some personal information is necessary so that we can provide you with the Services you have requested. Failure to provide this information may prevent us from providing you with access to our Services.

(b) Information We Collect Automatically

When you access or use the Services, we or our third-party agents or service providers automatically collect information about the device you use to access the Services and your activity when you use the Services. Depending on the Services you use and how you use the Services, the information may include:

- i. ***Device and Usage Information:*** We collect certain information about your device and how you interact with the Services each time you access or use them.
 - Log data includes your Internet Protocol (“IP”) address, browser type and settings, the date and time of your request, and how you interact with our Services.
 - Device information may include your browser type and version, browser settings, time zone, unique device identifiers, information about your approximate location (as determined through your IP address), mobile, computer, and/or device hardware information (e.g., operating system version, hardware model, IMEI number, and other unique device identifiers, MAC address, and device settings), device event information, log information, and crash data.
 - Usage information may include features that you use, clickstream data, access dates and times, and how you interact with the Services. When you visit the Website, this information may also include referring / exit pages and URLs, how you interact with links on the Website, landing pages, and pages viewed. We also may collect the date and time you open an email communication from us or click on any links in an email, and we or our service provider may associate this information with the email address we already have from you. We may also use the information we collect automatically (for example, IP address, and unique device identifiers) to identify the same unique person across the Services to provide a more seamless and personalized experience to you.
- ii. ***Cookies and Other Tracking Technologies:*** We and our third-party service providers or agents may collect information using one or more Cookies or similar technologies such as pixels (collectively “**Cookies**”). Cookies may collect information such as your IP address, unique device identifiers, your browser settings, and information about how you use the Services (e.g., the pages you view, the links you click). Please refer to the Cookies and Tracking Technologies section below for more information about our use of Cookies and your choices related to Cookies.

(c) Customer Content

We collect, receive, or access Customer Content that our customers and their Authorized Users input or submit while using the Services. We process Customer Content pursuant to our agreements with our customers.

(d) Information from Third Parties

Depending on the Services you use or how you use the Services, we collect and process personal information we receive from third parties, and we may combine personal information we receive from you with personal information we obtain from other sources. We may receive the following types of information from third parties:

- i. **WattIQ's Service Providers:** We receive information from our service providers or agents who perform business services for WattIQ, such as Website activity information from third parties that assist us in operating our Website and transactional data from our third-party infrastructure service providers and security and fraud detection providers.
- ii. **Analytics, Marketing, Advertising Providers, and WattIQ Partners:** We may receive information from third parties that perform data analytics, targeted advertising, marketing and/or lead generation functions for WattIQ, such as lead generation providers, third-party data enrichment tools, and analytics vendors. We may also receive contact information from WattIQ business partners with whom we operate co-branded events, webinars, services and marketing campaigns or joint offerings.
- iii. **Recruiting Information from Third-Parties:** We may collect information from third-party social media and jobs platforms, such as LinkedIn, for our recruiting purposes. We may also receive information from third-party recruiters and agencies that assist us with our recruiting activities.

3. How We Use Personal Information

The ways we use personal information depend upon the Services you use and how you use them. We use the personal information we collect in the following ways:

- To provide and operate the Services;
- To create and manage your WattIQ account and any user accounts;
- To process and manage billing and payment for Services;
- To respond to your inquiries and requests, or otherwise communicate with you, and to provide you with assistance related to the Services;
- To provide technical support for, secure, and protect the Services, including to detect and prevent fraud, abuse, or security risks, and to troubleshoot;
- To conduct research and analytics related to the Services, such as to understand how they are being used and where improvements may be needed;
- To personalize and improve user experience with the Services;

- To update, improve, and/or enhance the Services, and develop new features, functionalities, and/or Services;
- To better understand your personal preferences and to enable us to provide you with improved and personalized communications;
- To compile aggregate data, such as about traffic and interaction with or on the Services;
- To post testimonials about the Services;
- To send you newsletters, promotional and marketing communications that may be of interest to you;
- For our advertising purposes, such as to display personalized advertisements to you regarding the Services on third-party sites and measure their success;
- To tailor the content and advertising we display to you or others and to analyze trends and statistics;
- To provide notices, transactional updates, and other information to you about, or in connection with, our Services;
- For our internal recruiting and hiring purposes;
- To enforce our Terms of Service, resolve disputes or otherwise to carry out our obligations and enforce our rights, and to protect our business interests and rights of third parties;
- To audit our compliance with legal and contractual requirements and internal policies;
- To comply with legal and contractual obligations and requirements, law enforcement requests, and legal process;
- For our business transfers;
- To keep you updated about changes to policies related to our Services (including this Privacy Policy); and
- For any other purpose with your consent.

We may combine any of the information that we collect from you with other information, including information that we obtain from third parties, or with information derived from any other products or services we provide. We will use this information for the purposes described in this Privacy Policy.

4. How We Disclose Personal Information

We transmit, disclose, grant access, make available and provide personal information to or with the following types of third parties

(a) Corporate Account Administrators and Other Users of the Same Corporate Account

If you are using the Services through a corporate account, the administrators of that account may access and control your WattIQ account. Certain features may allow you to display or share information with other Authorized Users of the same corporate account.

(b) Service Providers

We disclose personal information with our third-party vendors, consultants, agents, contractors, and service providers that help us provide our Services or with any of the purposes described in this Privacy Policy. Depending on the Services you use and how you use the Services, the following categories of Service Providers may collect data on our behalf or receive personal information:

- Hosting service providers,
- Analytics providers,
- Advertising and marketing partners,
- Providers of business operations and communication tools, such as email and messaging software providers,
- Customer relationship management and customer support service providers,
- Security and fraud-prevention providers,
- Other third-party service providers that help us provide features and functions for the Services, and
- Professional advisors, agents and service providers, such as auditors, lawyers, consultants, accountants and insurers.

(c) WattIQ Partners

From time to time, we may work with other businesses to sponsor or host conferences or webinars, market related services, promote joint ventures or other similar collaborations. We might disclose personal information, such as your name and email address, with our partners in these situations.

(d) Legal, Compliance and Regulatory Purposes

We may disclose personal information if we believe that it is necessary to:

- comply with a law, regulation, legal process, or legitimate governmental request;
- protect the safety or security of the Services, users of the Services, or any person;
- investigate, prevent, or take action regarding illegal or suspected illegal activities;
- prevent spam, abuse, fraud, or other malicious activity of actors using or accessing the Services; or
- protect our rights or property or the rights or property of those who use the Services.

Non-public information about our users will not be released to law enforcement except in response to an appropriate legal process such as a subpoena, court order, or other valid legal process that has been reviewed by WattIQ. However, if we receive information that provides us with a good faith belief that there is an exigent emergency, we may provide information to law enforcement trying to prevent or mitigate the danger, to be determined on a case-by-case basis.

(e) Business Transfers

We may disclose personal information to third parties we choose to acquire or with buyers, successors, or others in connection with a merger, divestiture, restructuring, reorganization, financing due diligence, initial public offering, dissolution, or other sale or transfer of some or all of

our assets or transition of service to another provider, whether as a going concern or as part of bankruptcy, receivership, liquidation or similar proceeding, as permitted by law and/or contract.

(f) Testimonials

We may disclose personal information by posting testimonials on our Services. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. You can request your testimonial be updated or deleted at any time by sending a request with your name, testimonial location and contact information.

(g) With Your Consent

There may be situations where you are asked to consent to disclose personal information with third parties for additional reasons not included in this Privacy Policy.

5. Cookies and Tracking Technologies

As described above in this Privacy Policy, we collect and may permit third parties to collect information using cookies and other similar technologies.

(a) What Are Cookies?

Cookies are small data files that are placed on your device set by us or by third parties when you visit a website or other online service. In addition to cookies, we may use other technologies that are similar in function, such as pixels, also called web beacons or single-pixel tags/gifs, local or web storage, and embedded scripts.

- **Pixels:** Also called web beacons, or “clear gifs,” and single-pixel tags/gifs, or web tags, are tiny graphics with a unique identifier placed on a website or in an email that gathers information about your interaction with that website or email. Because of their small size, they are not visible. Pixels can also enable us and third parties to place cookies on your browser.
- **Local or Web Storage:** Local or web storage refers to other places on a browser or device where information can be stored. It includes both your own device storage and browser cache.
- **Embedded Scripts:** An embedded script is a programming code that is designed to collect information about your interactions with the Services, such as the links you click. The code is temporarily downloaded onto your device, is active only while you are connected to the Services and is deactivated or deleted after you are no longer connected.

We use the term “**Cookie**” throughout this Privacy Policy to cover all these technologies.

You can find more information about cookies at: www.allaboutcookies.org.

(b) Types of Cookies

Cookies are often described by who created and placed them and how long they last. Types of Cookies generally include the following:

- **Persistent Cookies and Session Cookies**

- Persistent Cookies: A persistent Cookie stays in your browser and will be read by us when you return. A persistent Cookie helps us recognize you as an existing user, so it is easier for you to return and interact with our Services.
- Session Cookies: A session Cookie is temporary and enables you to move from page to page on our Services and allows information that you enter to be remembered. A session Cookie is deleted when you close your browser or after a short time.
- **First-Party Cookies and Third-Party Cookies**
 - First-party Cookies: These are Cookies set by the publisher of the website or online service you are visiting. First-party Cookies may be set either by us or by a service provider at our request.
 - Third-party Cookies: These are Cookies that are set by a party other than the publisher of the website you are visiting.

(c) What Types of Information Do Cookies Collect?

Cookies collect different types of information depending on the type of Cookie and its purpose. Some examples of information that may be collected by Cookies when you use our Services include:

- The pages or features you visit within our Services;
- The buttons you click on our Services;
- The date and time you visit our Services;
- The amount of time you spend on our Services;
- The IP address used to connect your device to the internet; and
- Your device (such as computer, mobile phone) and connection information such as your browser type and version and operating system.

(d) How Do We Use Cookies?

WattIQ uses Cookies for purposes such as providing content or features on our Services, helping us remember you and your preferences, and improving your user experience by making our Services more efficient and relevant to you. We, our service providers, and/or agents acting on our behalf, use the following persistent and session Cookies (which may be first-party or third-party Cookies) on our Services:

- **Strictly Necessary Cookies:** These Cookies are essential because they enable our Services to work properly, and they cannot be disabled. Without these Cookies, some of our Services cannot be provided. These Cookies do not gather information about you for advertising purposes. For example, these Cookies are used to:
 - Remember the information that you fill in when performing certain activities on your Services;
 - Pass information from one page to the next, for example when filling out forms;

- Read your browser and device settings to optimize the display of our Services;
- Identify misuse of our Services;
- Load our Services uniformly to maintain accessibility; and
- Authenticate users and prevent fraud.
- **Functional Cookies:** We use functional Cookies to remember your choices so we can tailor our Services to provide you with enhanced features and personalized content. For example, these Cookies can be used to remember your name or preferences on our Services. We do not use functional Cookies for online advertising. While these Cookies can be disabled, this may result in less functionality during your use of our Services. For example, we use these Cookies to:
 - Provide you a personalized experience, such as remembering how you have customized our Services;
 - Remember the information that you fill in when performing certain activities on our Services; and
 - Store your preferences such as language and location.
- **Performance or Analytics Cookies:** These Cookies help us understand how our Services are being accessed, used, or are performing. These performance or analytics Cookies may collect information about the content you view, what websites you visit immediately before and after visiting our Services, and your system and geographic information. The information generated by these Cookies will be transmitted to and stored by the applicable analytics services. For example, we may use performance or analytics Cookies to:
 - Maintain and continually improve our Services;
 - Keep track of the number of visitors to the pages within our Services;
 - Keep track of the length of time that each visitor spends on the pages within our Services;
 - Determine the order in which a visitor visits the various pages or features within our Services;
 - Identify performance issues with our Services; and
 - Assess which parts of our Services need improvement.
- **Advertising Cookies:** These third-party cookies are used to deliver advertisements that are relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of advertising campaigns. Advertising cookies are usually placed by advertising platforms that work with other organizations to deliver personalized experiences to you. These cookies are used to:
 - Keep track of how you interact with the advertisements that we serve;

- Keep track of which advertisements you have already been shown so that you are not always shown the same ones;
- Keep track of how many visitors click on the advertisement; and
- Improve reporting on campaign performance.

(e) Targeted Advertising

Our third-party advertising partners may collect information about your activity on our Services using tracking technologies, which include pixels and other Cookies. Tracking data collected by these third-party advertising partners is used to decide which ads you see and helps us provide more customized advertising and marketing.

(f) How to Manage or Delete Cookies

You can exercise your preferences concerning Cookies served on our Services by taking the steps outlined below.

- **Browser Settings:** You may alter the Cookie settings in your browser settings at any time. You may accept all or only certain Cookies. If you disable Cookies in your browser settings, however, you may find that certain sections of our Services will not work.
 - **First-Party Cookies:** If you do not want Cookies placed on your device, you can adjust the setting of your Internet browser to reject some or all Cookies and to alert you when a Cookie is placed on your device. To do this, follow the instructions provided by your browser (usually located within the “Help,” “Tools,” or “Edit” settings). While adjusting your browser setting can prevent the future placement of Cookies, it does not remove existing persistent Cookies.
 - **Third-Party Cookies:** Browsers also allow you to block third-party Cookies using the steps described above for first-party Cookies.
- **Preferences Tools:** There are several services available that can assist you with managing your Cookie preferences, including industry groups, standards associations, and tools provided by the Cookie providers. Please note that we have no affiliation with, and are not responsible for, third-party websites.
 - **Global Privacy Control and Privacy plug-ins:** You can block cookies used for interest-based ads by installing browser plugins like Privacy Badger, DuckDuckGo, Ghostery, or uBlock Origin and configuring them to block third-party cookies/trackers. For more information, please visit <https://globalprivacycontrol.org>
 - **Google Analytics:** You may download the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout>.
 - **DAA:** You may use the Digital Advertising Alliance (“DAA”) consumer choice tools to apply opt-outs to interest-based advertising and other applicable uses of web-viewing data by DAA participating companies by visiting <http://optout.aboutads.info/?c=2&lang=EN#completed>.

- **NAI:** You may also manage opt-outs through the Network Advertising Initiative (“NAI”) opt-out tool at <http://optout.networkadvertising.org/?c=1>
- **Web Beacons and Pixels:** You may avoid web beacons and pixels by disabling the functionality that allows remote images to load in your email account and refraining from clicking on any links in email messages.

Opting out through these mechanisms does not block all online advertising. You will continue to receive generic advertisements.

To learn more about how to manage Cookies and opt-out of Cookies being placed on your devices, please visit www.allaboutcookies.org.

6. Video Content

The Services may offer certain video content. When you view video content, we disclose information about the video content you view to our Service Providers, which may include third-party advertising partners.

7. "Do Not Track" Preferences

WattIQ Services do not monitor for or behave differently if your browser or device transmits a “Do Not Track” or similar message.

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, WattIQ does not currently alter our practices when we receive a “Do Not Track” signal from a visitor’s browser except as specifically required by law. For information about “Do Not Track” please visit [All About DNT](#).

8. Third-Party Links

We may provide links to other websites or resources with which we do not have a contractual relationship and over which we do not have control (“**External Websites**”). This Privacy Policy does not apply to or cover External Websites. Such links are not paid advertisements, nor do they constitute an endorsement by WattIQ of those External Websites and are provided to you only as a convenience. By clicking on links to the External Websites, the operators of the External Websites may collect personal information. We are not responsible for the content or data collection practices of those External Websites, and your use of External Websites is subject to their respective terms of use and privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

9. Third-Party Social Media Plugins

The Services may offer Social Media Platform sharing features and other integrated tools that enable you to share or view certain content via social media sites (such as the X (Twitter) “Follow”

button). These features may function as cookies or web beacons when you interact with them and collect information such as information about your device or your interactions with the Services, such as what you are viewing through the Services. If you are logged in to your account with the third party, the third party may be able to link information about your interactions with the Services to your account with them. Please refer to each third party's privacy policies to learn more about its data practices.

10. Children's Privacy

Our Services are not intended for use by anyone younger than the age of 18 or under the applicable legal age of the relevant country. We do not knowingly collect personal information from children younger than the age of 18 without the consent of a parent or legal guardian, as required under applicable law. If you learn or believe that a child under the age of 18 has provided us with personal information, please contact us using the methods provided in the [Contact Us](#) section of this Privacy Policy below.

11. Your Choices

(a) Marketing Preferences

To stop receiving, or opt-out of, promotional email communications from WattIQ, click on the "unsubscribe" link or follow the relevant opt-out instructions within the marketing communication.

If you opt-out of receiving marketing emails, we will still send you transactional emails, such as for responses to your requests or communications about your account.

To stop receiving SMS marketing communications from WattIQ, you can opt out at any time by responding with the opt-out notice indicated in the SMS communication. Please note that SMS alerts are transactional. To manage SMS alerts, please contact your corporate account administrator.

(b) Third Party Advertising and Analytics

WattIQ works with third-party network advertisers, ad agencies, and other advertising partners to serve WattIQ ads online. We may use information we have learned about you to target ads to you and to allow our third-party advertising partners (e.g., Meta/Facebook, Google, Apple Search Ads, etc.) to manage our advertising on their websites. We also use third-party analytics providers to provide us with information regarding the use of the Services and the effectiveness of our advertisements. For more information about the tracking technologies that these third parties use and your options, please see the [Cookies and Tracking Technologies](#) section.

12. How Long We Retain Personal Information

We retain personal information for the purposes stated in this Privacy Policy and as required under applicable law. To determine how long we keep personal information, we consider the amount, nature, and sensitivity of personal information, the reasons for which we collect and process the information, and applicable legal requirements.

13. How We Protect Personal Information

At WattIQ, we take our responsibility to protect the security and privacy of personal information seriously. We have implemented what we believe to be reasonable and appropriate security measures designed to prevent personal information from being lost, used, accessed, altered, or disclosed in an unauthorized or unlawful way.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and we cannot and do not guarantee that personal information is completely secure and safe from such risks. By using the Services, you understand and assume the risks associated with your activities on the Internet.

If you have reason to believe that your information is no longer secure, please let us know by contacting us using the methods provided in the [Contact Us](#) section of this Privacy Policy.

14. California “Shine the Light” Disclosure

The California “Shine the Light” law gives residents of California the right under certain circumstances to opt-out of the sharing of certain categories of personal information with third parties for their direct marketing purposes. We do not currently share or disclose personal information with third parties for their own direct marketing purposes.

15. Notice to Nevada Residents

Under Nevada law, Nevada “consumers” (individuals who are seeking or acquiring goods/services for personal, family, or household purposes) may opt out of the sale of covered personal information.

WattIQ does not currently sell covered information of Nevada consumers as defined under applicable Nevada law.

You may submit an opt-out request by sending your request to the email address or mailing address specified in the [Contact Us](#) Section below, along with your full name, complete mailing address (including street address, city, state, and zip code), email address (so that we can contact you, if needed, in connection with the request) and confirmation that you are a Nevada resident.

16. International Data Transfers

The personal information that we collect or receive may be transferred to and processed in countries located outside of your country of residence to the countries where we or our third-party service providers process it. The data protection laws of the countries where personal information is processed may not be as comprehensive as or equivalent to those in your country of residence. Whenever we transfer personal information internationally, we take steps to protect it as required under applicable law.

17. Notice to European and Non-U.S. Residents

This notice supplements the information provided in this Privacy Policy and applies only to individuals located in the EEA, UK, Switzerland, or another country other than the United States of America with a comprehensive data protection law who are within the scope of this Privacy Policy.

For the purposes of the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and relevant local data protection laws, WattIQ is (a) the data controller of personal information about users of the Services and (b) the data processor of Customer Content. "**Personal information**" as used in this Notice to European and Non-U.S. Residents means "personal data," as defined in Article 4(1) of the GDPR or the relevant section of the local data protection laws. If you have any questions about how we process your personal information, or to exercise your data protection rights please contact us using the methods provided in the [Contact Us](#) section of this Privacy Policy below.

(a) Legal Basis for Processing

WattIQ processes personal information where there is a legal ground to do so, as described below. The applicable legal ground depends on the Services you use and how you use them.

- i. **Performance of a Contract.** We process personal information for the performance of our Services under the terms of our agreement with you in the Terms of Service or applicable agreement. This includes, for example, using personal information to:
 - a. Create and manage your account;
 - b. Facilitate your use of the Services;
 - c. Process and manage billing and payments;
 - d. Maintain and protect our Services in accordance with this Privacy Policy and the applicable Terms of Service;
 - e. Provide customer support; and
 - f. Respond to your inquiries and requests, or otherwise communicate with you, and provide you with assistance related to the Services.
- ii. **Legitimate Interest.** We process personal information when WattIQ has a legitimate interest to do so. This includes, for example, processing personal information to:
 - a. Provide you with customer service or technical support;
 - b. Debug, update and improve the Services;
 - c. Personalize your experience using the Services;
 - d. Send you marketing communications in accordance with your applicable marketing preferences;
 - e. Prevent or detect fraud on the Services;
 - f. Conduct analytics regarding the Services;
 - g. Engage in targeted advertising; and

- h. Establish, exercise, or defend legal claims or in connection with any court or jurisdiction.

You may request more information regarding our processing activities based on legitimate interest by contacting us with your request and confirmation of your country of residence using the methods provided in the [Contact Us](#) section of this Privacy Policy below.

- iii. **Legal Obligation.** We process personal information for compliance with any legal obligation to which WattIQ is subject.
- iv. **Consent.** We process personal information based on consent where we obtain your consent prior to such processing. This processing may include, for example:
 - a. Surveys, testimonials, and certain marketing communications about our Services or other services or products we think might interest you;
 - b. Promotional activities that you may choose to join; and
 - c. Certain marketing or advertising features or content.

Where WattIQ relies on your consent as the lawful basis for processing personal information, you have the right to withdraw your consent to further use of your personal information at any time. You can use the methods described in [Exercising Your Rights](#) below to withdraw your consent.

(b) Your Data Rights

Under the GDPR and relevant local data protection laws, you have certain rights regarding your personal information. Depending on your country of residence, your rights may include:

- **The right to be informed** – that is a right to be informed about how we use personal information (and that is what we are doing in this Privacy Policy);
- **The right of access** – that is a right to make what is known as a ‘data subject access request’ for a copy of the personal information we hold about you;
- **The right to rectification** – that is a right to request that we correct personal information about you that may be incomplete or inaccurate (though we generally recommend first making any changes in your account if you registered for one);
- **The right to erasure** – that is where, in certain circumstances, you can ask us to delete the personal information we have about you;
- **The right to restrict processing** – that is a right for you in certain circumstances to ask us to suspend processing personal information;
- **The right to data portability** – that is a right for you to ask us for a copy of your personal information in a common, machine-readable format (for example, a .csv file);
- **The right to object** – that is a right for you to object to us processing your personal information (for example, if you object to us processing your personal information for direct marketing);

- **Rights in relation to automated decision-making and profiling** – that is a right you have for us to be transparent about and not be subject to any profiling or any automated decision-making we may do;
- **Withdraw Consent** – if we have collected and processed personal information with your consent, you have the right to revoke that consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent; and
- **File a complaint** – that is the right to file a complaint with a local supervisory authority about our collection and processing of your personal information.

(c) Exercising Your Rights

For each of the rights described above, and for any complaints you may have, please [contact us](#).

We respond to all requests we receive from individuals wishing to exercise their data rights in accordance with applicable data protection laws. These rights are subject to certain rules around when you can exercise them.

We may need to request specific information from you to help us confirm your identity before we can respond to your request. This is a security measure to help ensure that personal information is not disclosed to any person who has no right to receive it and to help ensure that the person exercising the right is the person about whom the personal information relates.

If you are located in the EEA, the United Kingdom, or Switzerland, you have the right to make a complaint at any time to the supervisory authority for data protection issues in your country of residence. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us using the methods provided in the [Contact Us](#) section of this Privacy Policy below.

For more information on how to contact your data protection authority, please see:

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner's Office \(ICO\)](#)

18. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. When we update this Privacy Policy, we will revise the “Last Updated and Effective Date” at the top of this Privacy Policy and post a link to the updated Privacy Policy on our Services. Changes to this Privacy Policy are effective when they are posted. If we make any material changes, we will provide you with notice as required under applicable law. Please review this Privacy Policy periodically to ensure you are aware of any such changes.

19. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact us:

- By email at privacy@wattiq.io;
- By email for requests under GDPR in the EEA and UK at eearep@wattiq.io;
- By postal mail at this address:

WattIQ, Inc.

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