

Customer Privacy Policy

Introduction

Watts Battery, Ltd. and its affiliates (“WATTS”) respect your concerns about privacy. This Privacy Policy explains WATTS’s policies and procedures regarding information we collect from or about our customers and their use of our products and services. WATTS intends to provide you with a level of comfort and confidence in how we collect, use, share, and safeguard information that we collect. This Privacy Policy also explains how you can contact us if you have any questions or concerns. By providing information to us or by using our products or services, you agree to the terms and conditions of this Privacy Policy.

Information We May Collect

We collect three main types of information related to you or your use of our products and services: (1) information from or about you or your devices; (2) information from or about your WATTS power cell; and (3) information from or about your WATTS energy products. Depending on the WATTS products and services you request, own, or use, not all of these types of information may be applicable to you.

From or about you or your devices

We may collect information from or about you (such as your name, address, phone number, e-mail, payment or financial information, information about your family, etc.) or your devices in a variety of ways, including:

1. Through the Services: We may collect information from or about you through our websites, software applications, social media pages, e-mail messages, or other digital services (the “Services”), e.g., when you sign up for a newsletter, make a purchase, or register your product with us.
2. From other sources: We also may receive information about you from other sources, such as public databases, joint marketing partners, certified installers, third-party service centers, and social media platforms. We also may receive information about you, members of your family, persons with whom you have financial arrangements (e.g. joint account) or business partners from you or from credit reference and fraud prevention agencies (who may search the electoral register). This includes information that other organizations give us, when you apply for an account, or which we or they learn from the way you use and manage your account(s). If you give us information about someone else, you are responsible for ensuring that the information is accurate and that these persons have been informed about and agree to the processing of their information as described in this Privacy Policy, including assessing your collective financial situation.
3. Personal WATTS: Customers who purchase certain WATTS products will receive a personal WATTS account, which is hosted on our website or on partner platform. We may collect and process the following types of data for your WATTS account that you elect to provide to us: your customer registration information; the status of your order; warranty and other documentation for your WATTS products; and general information about your WATTS products (including, for example, vehicle identification number or

other product serial number, service plan information, or connectivity package), insurance forms, driver's licenses, financing agreements, and similar information. You can access your WATTS account to update the information from or about you in that account at any time.

4. Offline: We may collect information from or about you offline, such as when you visit a WATTS store or service facility, attend one of our events, place an order over the phone, or contact our customer services or sales department.

5. Through your browser or device: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the Services (such as the WATTS App) you are using. We use this information to ensure that the Services function properly.

When you visit our website or otherwise use our Services, we may use cookies, pixel tags, analytics tools, and other similar technologies to help provide and improve our Services, and as detailed below:

1. Cookies: Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other web traffic data. Our service providers and we use the information for security purposes, to facilitate online navigation, to display information more effectively, to personalize your experience while using the Services, and to otherwise analyze user activity. We can recognize your computer to assist your use of the Services. We also gather statistical information about the usage of the Services in order to continually improve their design and functionality, understand how the Services are used, and assist us with resolving questions regarding the Services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and to display them to you. We may also use cookies in online advertising to see how you interact with our advertisements, and we may use cookies or other files to understand your use of other websites.

If you do not want information collected through the use of cookies when using your WATTS account or our website, there is a simple procedure in most browsers that allows you to automatically decline cookies or gives you the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Services. For example, we may not be able to recognize your computer, and you may need to log in every time you visit the applicable Services.

2. Pixel tags and other similar technologies: Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of users of the Services (including e-mail recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.

3. Analytics tools: We use website and application analytics services provided by third parties that use cookies and other similar technologies to collect information about website or application use and to report trends, without identifying individual visitors.

The third parties that provide us with these services may also collect information about your use of third-party websites.

You can learn about Google's practices in connection with this information collection and how to opt out of it by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

From or about your WATTS power cell

We may collect a variety of information from or about your WATTS power cell, including:

1. Log data: To improve our power cells and services for you, we may collect certain data regarding the performance, usage, operation, and condition of your WATTS power cell, including the following: e.g., battery use management information; battery charging history; electrical system functions; software version information; system data; and other data to assist in identifying issues and analyzing the performance of the power cell. We may collect such information either in person (such as during a service appointment) or via remote access.

2. Remote analysis data: We may be able to dynamically connect to your WATTS to diagnose and resolve issues with it, and this process may result in access to personal settings in the power cell (such as load history, errors log, power sources type and performance etc.). This dynamic connection also enables us to view the current location of your power cell, but such access is restricted to a limited number of personnel within Watts Battery.

3. Service history: In order to facilitate the servicing of your power cell, we may collect and process data about the service history of each WATTS, including, e.g., the customer's name, WATTS identification number, repair history, any outstanding recalls, any bills due, any customer complaints, and any other information related to its service history.

If you no longer wish us to collect Log Data or any other data from your WATTS power cell, please contact us as indicated in section below. Please note that, if you opt out from the collection of Log Data or any other data from your WATTS power cell (with the exception of the Data Sharing setting detailed above), we will not be able to notify you of issues applicable to your power cell in real time, and this may result in your power cell suffering from reduced functionality, serious damage, or inoperability, and it may also disable many features of your power cell including periodic software and firmware updates, remote services, and interactivity with mobile applications.

From or about your WATTS energy products

We may collect a variety of information from or about your WATTS energy products from you, via a certified installer or from the installed products (directly or via paired equipment, such as smart home systems), including:

We may collect information about your product, such as your installation date, number of products installed, and serial number(s).

In order to provide and improve our energy products and services, we may collect data regarding where your product is installed and how it is configured, data related to the product's use and performance, data regarding your aggregate home energy

consumption, and other data relevant to diagnose issues.

If you no longer wish us to collect performance data or any other data from your WATTS energy product, please contact us as indicated in section below. Please note that if you opt out from the collection of performance data from your WATTS energy product, we will not be able to notify you of issues applicable to your energy product in real time, and this may result in your energy product suffering from reduced functionality, serious damage, or inoperability, and it may also disable many features of your energy product including periodic software and firmware updates.

Possible way of using information we collect

We may use information we collect to communicate with you, to provide and improve our products and services, and for other purposes. Examples of how we use information for these purposes are provided below.

To communicate with you

We may use information we collect to communicate with you, such as:

To respond to your inquiries and fulfill your requests, such as to send you newsletters or product information, information alerts, or brochures.

To advise you of important safety-related information.

To send administrative information to you, for example, information regarding the Services and changes to our terms, conditions, and policies.

To present products and offers tailored to you and to enhance our lists with information from other sources.

To allow you to participate in contests and similar promotions and to administer these activities.

To facilitate social sharing and communications functionality.

If you no longer want to receive marketing-related e-mails from us or our affiliates, you may opt out of receiving them by contacting us at the address below. Please note that we may still send you important administrative and safety messages even if you opt out of receiving marketing e-mails.

If you receive a marketing-related call from us and do not want to receive similar calls in the future, simply ask to be placed on our "do not call" list. Please note that we may still call you regarding administrative, safety, or product service issues even if you opt out of receiving marketing calls.

We may use information we collect to provide and improve our products and services, such as:

To complete and fulfill your purchase, e.g., to process your payments, have your order delivered to you, communicate with you regarding your purchase, and provide you with related customer service.

To provide service to your WATTS product, such as to contact you with service recommendations and to deliver over-the-air updates to your product.

To monitor your WATTS product's performance and provide services related to your product.

To develop and promote new products and services, and to improve or modify our existing products and services.

To analyze and improve the safety and security of our products and services.

To deliver any other services you have requested.

For other purposes

We also may use information we collect for other purposes, such as:

For our business purposes, such as: data analysis; audits; fraud monitoring and prevention; identifying usage trends; determining the effectiveness of our promotional campaigns; and operating and expanding our business activities.

For credit reference and fraud prevention purposes, such as: to check and manage your eligibility for credit, your details, application and account(s); to carry out assessment, testing, including for credit and behavior scoring, statistical, market and product analysis; to check information relating to members of your family, persons with whom you have financial arrangements, or business partners; to meet our regulatory obligations, prevent, detect, and prosecute money laundering, fraud, or other similar crimes; to locate you and recover any debts you owe; to cross-check details on proposals or claims for all types of insurance; and to process and collect charges.

Except as described above and below, WATTS may use or share information that does not personally identify you for any purpose, such as for operational or research purposes, for industry analysis, to improve or modify our products and services, to better tailor our products and services to your needs, and where legally required.

How we may share information we collect

We may share information we collect with our service providers and business partners, with other third parties you authorize, with other third parties when required by law, and in other circumstances.

With WATTS affiliates for the purposes described in this Privacy Policy. WATTS affiliates are companies that are owned or controlled by Watts Battery, Ltd. and companies in which Watts Battery, Ltd. has a substantial ownership interest.

With our third party service providers and channel partners to provide services such as website hosting, data analysis and storage, payment processing, order fulfillment and product installation, wireless connectivity to WATTS products, information technology and related infrastructure, customer service, product maintenance or related services, e-mail delivery, credit card processing, auditing, marketing, and other similar services.

With other third party business partners to the extent that they are involved in your purchase or the service of your WATTS products. We share limited information from or about you to allow you to take advantage of those services if you elect to utilize them, with such partners as finance, leasing, registration, and title companies.

With other third parties you authorize

With our certified installers to facilitate the provision of energy products to you that you have requested.

With third party service centers or providers, if you choose to utilize them. Note that some information about you is stored on certain WATTS products and may be accessible directly to the third party service centers or providers that you choose to

utilize to diagnose or service your WATTS product.

With third-party sponsors of contests and similar promotions, if you elect to participate. With your social media account provider, if you connect your Services account and your social media account. If you do so, you authorize us to share information with your social media account provider and you understand that the use of the information we share will be governed by the social media account provider's privacy policy.

WATTS may transfer and disclose information, including information that may or may not personally identify you, to third parties to comply with a legal obligation (including, but not limited to, subpoenas); when we believe in good faith that the law requires it; in response to a lawful request by governmental authorities conducting an investigation, including to comply with law enforcement requirements; to verify or enforce our policies and procedures; to respond to an emergency; to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable; or to protect the rights, property, safety, or security of the Services, WATTS, third parties, visitors to our Services, or the public, as determined by us in our sole discretion.

WATTS may share your information with credit reference agencies to make enquiries when you ask for any lending products or to assist us with checking credit eligibility, and with fraud prevention agencies when we suspect you have given us false or inaccurate information, or if we suspect fraud or other crimes. The agencies may keep a record of our enquiries about you and link these records with those associated with you. An enquiry at a credit reference agency may be assessed with reference to any associated records. The agencies may use and provide this information to other organizations (including other lenders, insurers, and law enforcement) using their services in the Finland and other countries for the purposes of checking your credit eligibility, preventing and detecting fraud, crimes and money laundering, and related purposes. Examples of circumstances when we would share your information or information about your relatives include checking details on applications for credit and credit-related or other facilities, managing credit and credit related accounts and facilities recovering debt, checking details on proposals and claims for all types of insurance, checking details of job applications and employees. Please contact us if you would like details of those agencies from whom we obtain and to whom we pass information about you.

With your employer or other fleet operator or the owner of the WATTS product, if you do not directly own it and as authorized under applicable law.

With a third party in connection with any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

We do not share information that personally identifies you with unaffiliated third parties for their marketing purposes unless you opt in to that sharing.

If you wish to opt out of any processing of information for which you have provided your prior explicit opt-in consent, you may do so by contacting us as indicated in the section below.

Cross Border Transfers

The Services are controlled and operated from the Russia. Information from or about you or your use of our products or the Services may be stored and processed in any country where we have facilities or in which we engage service providers. Those countries may not have the same data protection laws as the country in which you initially provided that information. When we transfer information from or about you or your use of our products or the Services to other countries, we will protect it as described in this Privacy Policy. By using our products, the Services, or otherwise providing information to us, you consent to the transfer of information from or about you or your use of our products or the Services to countries outside of your country of residence, including the Russia.

Customer choice

As detailed in the sections above, we give you many choices regarding our collection, use, and sharing of information from or about you or your use of our products or the Services. Subject to applicable law, in certain jurisdictions you may also have the rights to request access to and receive information about certain information we maintain about you, update and correct inaccuracies in that information, and have the information blocked or deleted, as appropriate. These rights may be limited in some circumstances by local law. We give you several methods to access, correct, update, or request blocking or deletion of information from or about you including:

You can access your WATTS account to update the information from or about you in that account at any time.

If you would like to review, correct, update, suppress, or delete information from or about you that has been previously provided to us by you, you may contact us at the address below.

In your request, please make clear what information you would like to have changed, whether you would like to have the information that you have provided to us suppressed from our database, or otherwise let us know what limitations you would like to put on our use of the information that you have provided to us. For your protection, we may only implement requests with respect to the information associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request.

We will comply with your request(s) to exercise these choices as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping or legal compliance purposes and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the information provided until after the completion of such purchase or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed.

Security

We seek to use reasonable organizational, technical, and administrative measures to protect information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account with us has been compromised), please immediately notify us of the problem by contacting us in accordance with section below.

If you sell or transfer your WATTS product to another person, please notify us so that we can determine whether additional steps are required to help safeguard information from or about you from disclosure to the purchaser or transferee of the WATTS product.

Retention Period

We will retain information we collect from or about our customers, our products, and the Services for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Minors

The Services are not directed to individuals under the age of eighteen (18), and we request that these individuals not provide any information to WATTS.

Links

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates, nor does it imply an affiliation with the third party.

Please note that we are not responsible for the collection, use, or disclosure policies and practices (including the data security practices) of other organizations, such as any other app developer, app provider, social media platform provider, operating system provider, or wireless service provider, including any information you disclose to other organizations through or in connection with our software applications or social media pages.

Updates to this Policy

We may change this Privacy Policy. Please take a look at the "Last Updated" legend at the bottom of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the Services. By using our products, the Services, or otherwise providing information to us following these changes, you accept the revised Privacy Policy.

How to Contact Us

To contact us with a question or comment or to opt out from certain services, please contact us:

via e-mail at support@wattsbattery.com;

via mail at Watts Battery, Ltd., Attn: Legal, 143026, Lugovaya St., 4/5, Skolkovo Innovation centre territory, Moscow, Russian Federation

Please note that e-mail communications are not always secure, so please do not include credit card information or sensitive information in your e-mails to us.

If you are located in the EEA or Switzerland, your local WATTS affiliate may be the entity responsible for processing your personal information.

Last Updated January 2017