

# ZAP Privacy Notice

This Privacy Notice describes how ADDWII and its affiliates (collectively "ADDWII", "our", "us", or "we") collect and process your information through ZAP APP, websites, devices, products, services, products free trial projects, online and physical stores, and applications that reference this Privacy Notice (together "ZAP Services"). By using ZAP Services, you are consenting to the collection of your information and practices described in this Privacy Notice.

## Our collection of information

We collect your information in order to provide and continually improve our products and services.

Here are the types of information we collect:

- **Information You Give Us:** We receive and store any information you provide in relation to ZAP Services. You can choose not to provide certain information, but then you might not be able to take advantage of many of our ZAP Services.
- **Automatic Information:** We automatically collect and store certain types of information about your use of ZAP Services, including information about your interaction with products, content and services available through ZAP Services. We use "cookies" and other unique identifiers, and we obtain Technical data generated by your use, such as your Internet Protocol (IP) address, your browser type and capabilities and language and your operating system. when your web browser or device accesses ZAP Services.
- **Information from Other Sources:** We might receive information about you from other sources and combine it with information we already hold, such as updated delivery and address information from our carriers, which we use to correct our records and deliver your next purchase more easily.

## For What Purposes Does ADDWII Use Your Information?

We use your information to operate, provide, develop, and improve the products and services that we offer our customers. These purposes include:

- **Services and transactions.** We use your information to take and handle orders, deliver products and services, process payments, handling warranty claims, replacing product manuals, and communicate with you about orders, products and services, and promotional offers.
- **Provide, troubleshoot, and improve ZAP Services.** We use your information to provide

functionality, analyze performance, fix errors, and improve the usability and effectiveness of the ZAP Services.

- Recommendations and personalization. We use your information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalize your experience with ZAP Services.
- The legal basis on which we process information  
Where required by law, we will ensure there is a legal basis for the processing of your information. In most cases our legal basis will depend on the information concerned and the specific context in which we collect it.
- Contract: the processing is necessary for the performance of the services we provide to you, or in order to take steps (at your request) prior to, and in anticipation of, performing, such services;
- Legal obligation: the processing is necessary to comply with our legal obligations, including compliance with applicable laws, regulations, governmental and quasi-governmental requests, court orders or subpoenas;
- Consent: the processing is based on your consent to the processing of your information for one or more specified purposes (e.g. marketing);
- Legitimate interests: the processing is necessary to meet our legitimate interests, for example to develop and improve our Sites, products and/or services for the benefit of our customers; or
- Vital interests: the processing is necessary to protect your vital interests (e.g. you are our sales trial customer);
- Anonymizing information. In accordance with applicable law, ADDWII may anonymize your information so that it can no longer be used to identify you. Anonymized information is not considered the information specified in this Privacy Notice, and ADDWII may use Anonymized information in some instances. ADDWII either maintains such information without attempting to re-identify it or treats such data as personal data subject to applicable law;
- California Privacy Rights Act Sensitive Personal Information Disclosure. The categories of data that ADDWII collects and discloses for a business purpose include "sensitive personal information" as defined under the California Privacy Rights Act. ADDWII does not use or disclose sensitive personal information for any purpose not expressly permitted by the California Privacy Rights Act.
- Communicate with you. We use your information to communicate with you in relation to ZAP Services via different channels (e.g., by phone, email, chat).
- Advertising. We use your information to display ads for features, products, and services

that might be of interest to you, for your reference. We do not use information that personally identifies you to display the ads that are of interest to you.

- Fraud Prevention and Credit Risks. We use information to prevent and detect fraud and abuse in order to protect the security of our customers, ADDWII, and others.

## Disclosure of information

Information about our customers is an important part of our business, and we are not in the business of selling our customers' information to others. We may share your information with selected third parties in accordance with applicable law, including as set out below:

- Affiliate. We share customers' information only with our affiliates that either are subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.
- Third-Party Service Providers: We employ other companies and individuals to perform functions on our behalf, including fulfilling orders for products or services, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analyzing data, providing marketing assistance, processing payments, transmitting content, and providing customer service. These third-party service providers have access to information needed to perform their functions, but may not use it for other purposes. We require these service providers to protect the confidentiality of your information.
- Distributors, installation companies and other trusted business partners. We may share your information with third parties that distribute our products and other trusted business partners, so that such third parties may use your information for purposes that include allowing those third parties to send marketing communications to you. Such sharing of information for marketing purposes will be performed in accordance with applicable laws and regulations.
- Disclosure in connection with transactions. In connection with certain transactions, we may disclose some or all of your information to financial institutions, government entities and shipping companies or postal services involved in fulfillment of the transaction.
- Business Transfers: As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice. Also, in the unlikely event that ADDWII, or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.
- Protection of ADDWII and Others: We release your account and other information when we believe release of your information is required to comply with the law; enforce or apply our Conditions of Use and other agreements; or protect the rights, property, or safety of

ADDWII, our users, or others in accordance with applicable laws. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Other than as set out above, you will receive notice when information about you might be shared with third parties, and you will have an opportunity to choose not to share the information.

### **Cross-border transfers**

Cross-border transfers. As ADDWII operates a global business, we and some of our service providers may also access, process or store your information outside of the country, state, or province where you reside to the extent allowed by applicable laws and regulation. As a result, this information may be subject to the law of that foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction. All cross-border transfers will be performed in accordance with applicable laws and regulations.

### **Security**

We design our systems with your security and privacy in mind.

- We work to protect the security of your information during transmission by using encryption protocols and software.
- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of customer information (including your information). Our security procedures mean that we may ask to verify your identity before we disclose your information to you.
- Our devices offer security features to protect them against unauthorized access and loss of data. You can control these features and configure them based on your needs.
- It is important for you to protect against unauthorized access to your password and to your computers, devices, and applications. We recommend using a exclusive password for your ZAP account that is not used for other online accounts. Be sure to sign off when finished using a shared computer.

### **What Information Can I Access?**

You can access your information, including but not limited to your name, address, payment options, profile information, and purchase history in the "Your Account" section of the website.

## What Choices Do I Have?

If you have any questions as to how we collect and use your information, please contact our Customer Service. Many of our ZAP Services also include settings that provide you with options as to how your information is being used.

- As described above, you can choose not to provide certain information, but then you might not be able to take advantage of many of the ZAP Services.
- You can add or update certain information on ZAP APP or our pages. When you update information, we usually keep a copy of the prior version for our records.
- If you do not want to receive email or other communications from us, please adjust your Customer Communication Preferences. If you don't want to receive in-app or device notifications from us, please adjust your notification settings in the app or device.
- The Help feature on most browsers and devices will tell you how to prevent your browser or device from accepting new cookies or other identifiers, how to have the browser notify you when you receive a new cookie, or how to block cookies altogether. Because cookies and identifiers allow you to take advantage of some essential features of ZAP Services, we recommend that you leave them turned on.
- If you want to browse our websites without linking the browsing history to your account, you may do so by logging out of your account and blocking cookies on your browser.
- You can manage the recommendations you receive for ZAP Services, remove recommendations you don't want to see, and edit your browsing history by updating your setting.

In addition, to the extent required by applicable law, you may have the right to request access to, correct or delete your information (Please note that your information may not be deleted in its entirety from our systems, including in view of legal exceptions or obligations we have to retain certain data. We may also retain backup copies of your information, including to assist with any legal obligations, resolve disputes, and enforce our agreements. We will retain your information for as long as necessary to fulfill the purposes of processing described in this Notice). If you wish to do any of these things, you may also have the right to opt out of our processing of your information for targeted advertising, or the sharing of your information for cross-context behavioral advertising. Please contact Customer Service. Depending on your data choices, certain services may be limited or unavailable.

## Are Children Allowed to Use ZAP Services?

ADDWII does not sell products for purchase by children. If you are under 18, you may use ZAP Services only with the involvement of a parent or guardian. We do not knowingly collect information from children under the age of 13 without the consent of the child's parent or guardian.

### **Conditions of Use, Notices, and Revisions**

If you choose to use ZAP Services, your use and any dispute regarding this Privacy Notice is subject to its terms and our Conditions of Use, including limitations on damages, resolution of disputes, and relevant applicable laws. If you have any concern about this Privacy Notice or related matters, please contact us with a thorough description, and we will try to resolve it. Our business changes constantly, and our Privacy Notice will change also. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

### **Examples of Information Collected**

#### Information You Give Us When You Use ZAP Services

You provide information to us when you:

- search or shop for products or services in our ZAP Services;
- add or remove an item from your cart, or place an order through or use ZAP Services;
- view, or use content on a device or through a service or application on a device;
- provide information in Your Account or Your Profile;
- upload your contacts;
- configure your settings on, provide data access permissions for, or interact with an ZAP device or service;
- communicate with us by phone, email, or otherwise;
- complete a questionnaire, free trial campaign application form or promotion campaign log in;
- Participate in our free trial campaign.

As a result of those actions, you might supply us with such information as:

- identifying information such as your name, address, and phone numbers;
- payment information;
- your age;

- your location information;
- your IP address;
- people, addresses and phone numbers listed in your Addresses;
- content of reviews and emails to us;
- personal description and photograph in Your Profile;
- credit history information; and
- your product experience;
- air pollution data in your house;
- your allergy symptoms;
- The layout of your home space and the information on HVAC, exhaust fans, exhaust ventilation systems, fume extraction systems, WIFI coverage, and air infiltration status of your house.

### **Automatic Information**

Examples of the information we collect and analyze include:

- the internet protocol (IP) address used to connect your computer to the internet;
- login, email address, and password;
- the location of your device or computer;
- content interaction information, such as content downloads and streams details, including duration and number of simultaneous streams and downloads, and network details for streaming and download quality, including information about your internet service provider;
- device metrics such as when a device is in use, application usage, connectivity data, and any errors or event failures;
- ZAP Services metrics (e.g., the occurrences of technical errors, your interactions with service features and content, your settings preferences and backup information, location of your device running an application, information about uploaded files such as the file name, dates, times and location of your files);
- phone numbers used to call our customer service number; and
- We may also use device identifiers, cookies, and other technologies on devices, applications, and our web pages to collect browsing, usage, or other technical information.

### **Information from Other Sources**

Examples of information we receive from other sources include:

- updated delivery and address information from our carriers or other third parties, which we use to correct our records and deliver your next purchase or communication more easily;

- credit history information from credit bureaus, which we use to help prevent and detect fraud and to offer certain credit or financial services to some customers.

### **Changes to this Privacy Notice**

We may occasionally update this Privacy Notice. When we do, we will revise the "last updated" date at the top of the Privacy Notice and take such additional steps as may be required by law.