



DATA AND PRIVACY STATEMENT - NorsupOne

This is the Data and Privacy Statement relates to the data, including personal data, collected, and processed via the NorsupOne App ('App') and swimming pool components ("Norsup-One Products") sold directly or indirectly by MegaGroup Trade Holding B.V. located on Doornhoek 4205, 5465TG Veghel registered at the trade register under number 17174948 ('we', 'our' or 'us').

This statement will explain how we will use the (personal) data that we collect from users of our Norsup-One Products and App ('you' and 'your') via our Norsup-One Products and the App and which rights you have with respect to your (personal) data in accordance with the General Data Protection Regulation ('GDPR') and the Data Act.

1. Data processed via our App and Products

Personal data is any information that directly or indirectly identifies a natural person. Such information could include a name, e-mail address and the IP-address of your computer. However, we also generate data via Norsup-One Products that cannot identify you.

We generate data via our Norsup-One Products continuously and in real-time for the duration and under the conditions as set out in the terms and conditions of the Norsup-One Product. Such data will be stored inside Europe and can be accessed via the App. The data generated by the Norsup-One Products consist of monitoring data regarding the conditions of the pool, such as temperature, and pH The data also includes setpoints for controllers and heaters as well as alarms. As these are single values in low update frequencies, the amount of data generated via Norsup-One is low. The data generated via the Norsup-One Products is used for the provision of services to our customers, such as remote troubleshooting, preventive maintenance and performance analysis. We have a legitimate interest for processing this personal data based on article 6 (f) GDPR because without this information we cannot contact you in case of any alarms or issues.

We also process the data for analytics purposes to improve the Norsup-One Products and App and our services in relation to such. We have a legitimate interest for processing this personal data based on article 6 (f) GDPR because it will help us to optimize (the quality of) our Norsup-One Products and services.

The App allows you to remotely control your Norsup-One Products, to access (continuously and in real-time) to data generated by you when using the Norsup-One Products and to grant access to others, such as the installer of the Norsup-One Product.

When you register yourself via the App, we process your (email) address and password, to secure your (personal) data against unauthorized access. We have a legitimate interest for



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processing this personal data based on article 6 (f) GDPR because it enables us to secure the App for unauthorized access to your (personal data). You are required to provide such information to us to access the App and the data generated via the Norsup-One Products.

Furthermore, we process your name, address and contact details and provide such data to an installer to directly reach you in case of alarms or other issues that require direct contact. We have a legitimate interest for processing this personal data based on article 6 (f) GDPR because without this information we cannot contact you in case of any alarms or issues.

2. SHARING YOUR DATA

We might share your data with:

- affiliates of us insofar necessary to provide (access to) the App and the Norsup-One Products;
- installers of the Norsup-One Products, if you permit them to have access via the App.
- authorities and courts if we believe that the disclosure is required by law, or is in response to a legal request;
- with third parties that provide database-, server-, maintenance-, security-, or other similar services to us (hereinafter referred to as 'data processors'). If we provide access to your data, we require the third parties to keep your data confidential and instruct these parties to process this data only on behalf of us.

We do not transfer your data outside the European Economic Area ("EEA").

3. SECURITY

We implemented appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all other forms of unlawful processing. Also, we require our data processors to implement such appropriate technical and organizational measures.

4. RETENTION PERIOD

Your data will be stored no longer than is necessary for the purposes for which the personal data is collected unless otherwise required by law. We will delete your customer data within reasonable time after you stop providing us with access to the Norsup-One Product.



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5. YOUR RIGHTS

You have the right to request us to:

- to know whether or not we process your data;
- rectify your personal data;
- erase your data;
- restrict your personal data;
- cease the sharing with other parties; and/or
- us to transmit your data to you or another organization.

We may request provision of additional information necessary to confirm your identity. These rights are not absolute. We will assess your request in accordance with the GDPR and the Data Act.

You have the right to lodge a complaint with the supervisory authority about alleged violations of the GDPR and/or the Data Act at any time.

6. MODIFICATIONS

It is possible that this statement will be amended in the future. The most recent version will be available at www.norsup.eu at all times.

7. CONTACT US

If you have any questions or complaints, please do not hesitate to contact us via help@norsupone.com