

Last updated: May 2024

This privacy statement applies only to the “PLUZZ” application service provided by Shenzhen Black and White Grey Communication Technology Co., Ltd. (hereinafter referred to as “we” or “black and white grey”) for you, including device binding, device-related data, and other services.

This privacy statement will help you understand the following:

1. How we collect and use your personal information;
2. How do we transfer and publicly disclose your personal information;
3. How we collect and protect your personal information;
4. Permission call description
5. Third-party SDK Terms and Conditions
6. Your rights;
7. How do we handle children’s personal information;
8. Data storage location and duration;
9. Self-starting and associated starting;
10. How this privacy statement is updated;
11. How to contact us.

We are well aware of the importance of personal information to you and will do our best to protect your personal information safely and reliably. We are committed to maintaining your trust in us and abide by the following principles to protect your personal information: the principle of consistency between rights and responsibilities, the principle of clear purpose, the principle of choice and consent, the principle of minimum necessary, the principle of ensuring security, the principle of subject participation, the principle of openness and transparency, etc. At the same time, we promise to take corresponding security measures to protect your personal information according to the mature security standards in the industry. Please read and understand this privacy statement carefully before using our products (or services).

1. How do we collect and use your personal information

1.1 Personal information refers to various information recorded in electronic or other forms that can be used alone or in combination with other information to identify the identity of a specific natural person or reflect the activities of a specific natural person.

1.2

The “PLUZZ” app is designed to manage smart small appliances and provide services for

recording and analyzing data related to users' smart small appliances. It also requires the collection and use of your personal information. The personal information referred to in this statement includes device information and personal data. We will only collect and use your personal information for the following purposes described in this statement:

- Binding of smart small household appliances

In order to support the binding of your smart small appliance devices and applications, we may collect your smart small appliance device identification information, mobile device identification information, mobile phone model, system version number, and Bluetooth information of your smart small appliance.

The purpose of collecting the device MAC address is to bind the user with the Bluetooth connection of the smart small appliance device for data communication.

- Device data

It includes device identification, Bluetooth data, and calculated analysis data, which are used to store and display for users.

- Use duration data

Including the usage time of the device, these data are used to store and display for the user.

1.3 In order to protect the rights of Black White Grey, you or other Black White Grey customers, we will conduct risk control based on the information collected above to prevent fraud and other illegal activities. If you do not provide such information, we may not be able to provide you with the full range of services described above.

2. How do we transfer and publicly disclose your personal information

2.1 Transfer

We will not transfer your personal information to any company, organization or individual, except in the following circumstances:

- Transfer with explicit consent: After obtaining your explicit consent, we will transfer your personal information to other parties;
- When it comes to mergers, acquisitions, or bankruptcy liquidation, if personal information transfer is involved, we will require the new company or organization that holds your personal information to continue to be bound by this privacy statement.

Otherwise, we will require the company or organization to seek your authorization and consent again.

2.2 Public Disclosure

We will only disclose your personal information in the following circumstances:

- After obtaining your explicit consent;
- Disclosure based on law: We may disclose your personal information publicly when required by law, legal process, litigation, or mandatory requirements of government authorities.

3. How do we protect your personal information

3.1

We will use industry-standard security measures to protect the personal information you provide, preventing unauthorized access, disclosure, use, modification, damage, or loss of data. We will take all reasonable and feasible measures to ensure that unrelated personal information is not collected. We will only retain your personal information for the period necessary to achieve the stated purpose of this statement, unless an extension of the retention period is required or permitted by law.

3.2

The Internet environment is not 100% secure. We will try our best to ensure or guarantee the security of any information you send us. If our physical technology or management protective facilities are damaged, resulting in unauthorized access, public disclosure, tampering, or destruction of information, we will promptly inform you of the basic situation and possible impact of the security incident, the measures we have taken or will take to dispose of it, suggestions for you to independently prevent and reduce risks, and remedial measures for you in accordance with laws and regulations. We will promptly inform you of the relevant situation of the event through email, letter, phone, push notifications, and other means. If it is difficult to inform the personal information subject one by one, we will take reasonable and effective measures to publish an announcement. At the same time, we will also proactively report the handling of personal information security incidents in accordance with regulatory requirements.

4. PLUZZ Permission Call Description

In addition, the following device permissions may be triggered when you use PLUZZ. In order to better manage your information, we will inform you of the purpose of using the permission during the product usage process, as well as the impact of not opening the permission on your use of the service. Please review carefully. Before using specific features, you can choose whether to authorize the following permissions. At the same time, you can change the authorization status at any time through the device permission settings page.

The following details the relevant functions and access permissions for your reference:

(I) Android

4.1 Read and write external storage space: used to save pictures in the user's phone when the user shares them; when the user selects "select from album" for avatar settings, it is used to save cropped pictures in the user's phone.

4.2 Location permission: used to scan Bluetooth devices when users bind devices; used to synchronize weather information displayed on wearable devices for users;

4.3 Access network: used to obtain data on the network;

4.4 Bluetooth permission: used to connect your smart Bluetooth devices, such as smart hair dryers, smart toothbrushes, smart fans, etc;

(II) iOS

4.1 Bluetooth permission: used to connect your smart Bluetooth devices, such as smart hair dryers, smart toothbrushes, smart fans, etc;

4.2 Location permission: used to synchronize weather information displayed on wearable devices for users;

4.3 Accessing the network: used to obtain data on the network;

5. Third-party SDK terms and conditions

Please note that when using and accessing our services, you may also be subject to the terms and conditions and privacy policies of certain third parties such as app stores, map providers, mobile software platforms, social networking sites, and payment intermediaries. You acknowledge and agree that we are not responsible for the terms and conditions of these third parties or how they use your personal information. We may choose to link you to third-party products or services through advertisements or other forms. Please note that the third-

party products and services you use are not developed or managed by people or companies associated or controlled by us. We are not responsible for the actions, products, and services of these people or companies, as well as how they use the information you provide. Our providing links to them does not make us associated or controlled by them. We may provide services from our partners at any time, such as quiz and survey services. These services may require you to provide personal information to register or access. These services will indicate the identity of the partner when you need to disclose personal information. If you choose to disclose personal information, then this data may be provided directly or indirectly to third parties through us. You will accept their privacy policies and practices. We are not responsible for the privacy policies and practices of these third parties. Therefore, you should review their privacy policies and practices before disclosing personal information. Please note that in our services, some items may use third-party services to compare and verify information such as game identities, online shopping accounts, social accounts, and network accounts. If you choose to participate in or use these services, certain personal user or account data and sensor data may be automatically transmitted to these third parties. You hereby agree that we will process, use, integrate, disclose, and store this data in accordance with this policy.

For example, in the following cases, we may share your personal information with third-party service providers. Before using this feature, you confirm that you have carefully read the user agreement and relevant privacy policies of the third-party service.

5.1 Baidu Location SDK: The map service of the application is provided by Baidu Map (SDK: com.baidu.mapapi). We will provide your GPS location information to such service providers through SDK-related technologies to provide you with location-based services based on maps and location. Baidu Map Privacy Policy: <https://lbsyun.baidu.com/index.php?title=openprivacy>

6. Your Rights

6.1 You can go to “Home” > “Settings” > “Privacy Statement” > click “Disagree with this Privacy Statement” to revoke the authorization.

6.2 If you have further requirements or any questions, comments or suggestions regarding your data subject rights, you can contact us through the methods described in the “How to Contact Us” section of this statement and exercise your relevant rights.

6.3 To ensure security, you may need to provide a written request or otherwise prove your identity. We may ask you to verify your identity before processing your request. We will respond as soon as possible.

6.4 We will not charge fees for your reasonable requests in principle, but we will charge a certain amount of cost for repeated requests that exceed reasonable limits. For those requests that are unfounded, require excessive technical means (such as the need to develop new systems or fundamentally change existing practices), pose risks to the legitimate rights and interests of others, or are very unrealistic, we may refuse them.

6.5 We will not be able to respond to your request in the following circumstances:

- In connection with the performance of obligations stipulated by laws and regulations with personal information controllers;
- Directly related to national security and defense security;
- Directly related to public safety, public health, and major public interests;
- Directly related to criminal investigation, prosecution, trial and enforcement of judgment;
- Personal information controllers have sufficient evidence to show that the personal information subject has subjective malice or abused rights;
- Out of the need to safeguard the vital legal rights and interests of the personal information subject or other individuals, such as life and property, but it is difficult to obtain the consent of the individual;
- Responding to the request of the personal information subject will cause serious damage to the legitimate rights and interests of the personal information subject or other individuals and organizations;
- Involving trade secrets.

7. How do we handle children's personal information

7.1 This app is only for adults. Children should not create their own personal information accounts without the consent of their parents or guardians. Parents and guardians should also take appropriate precautions to protect children, including monitoring their use of this app.

7.2 Although the legal and customary definitions of children vary from place to place, we consider anyone under the age of 14 to be a child. For the collection of personal information from children with parental consent, we will only use or disclose this information when permitted by law, with the explicit consent of parents or guardians, or when necessary to protect children.

8. Data storage location and duration

8.1 Data storage location

If you are a user in Chinese Mainland, the personal information we collect and generate under this service will be stored on the server located in Chinese Mainland; If you are a user in a country or region other than Chinese Mainland, your data will be stored on the server in Singapore.

8.2 Data storage period

We will only retain your personal information for the time required to achieve our goals, and the time for storing personal information is 1 year. After exceeding the data retention period, if you no longer use our products, we will delete or anonymize your data within a reasonable period of time, unless otherwise required by laws and regulations; if you are still using our products, we will automatically extend the retention period for 1 year as allowed by law, in order to continue to provide more professional equipment management services. In addition, when our products or services cease operation, we will notify you in the form of push notifications, announcements, pop-ups, etc., and delete your personal information or anonymize it within a reasonable period of time.

9. Self-start and Associated Start

9.1 This application needs to run in the background to ensure that the connected smart home appliances can perform real-time Bluetooth data interaction, etc. It is necessary to use self-starting capabilities to send broadcasts through the system at a certain frequency to wake up the application for self-starting or associated starting behavior, which is necessary to implement this function and service.

10. How to update this privacy statement

10.1 Our Privacy Statement may change. We will not diminish your rights under this Privacy Statement without your explicit consent.

10.2 For major changes, we will also provide more prominent notifications. The major changes referred to in this statement include but are not limited to:

- Greater changes have taken place in our service model, such as the purpose of processing personal information, the types of personal information processed, and the ways in which personal information is used;
- We have undergone significant changes in ownership structure, organizational structure, and other aspects. Such as business adjustments, bankruptcy mergers and acquisitions, and other changes in ownership caused by changes in ownership;

- The main object of personal information sharing, transfer or public disclosure changes;
- There are significant changes in your rights to participate in the processing of personal information and the ways to exercise them;
- When there are changes in the department responsible for handling personal information security, contact information, and complaint channels;
- When the personal information security impact assessment report indicates a high risk.

11. How to contact us

11.1 We have established a dedicated department for personal information protection (or personal information protection officer). If you have any questions, comments or suggestions about this privacy statement, please contact us at the following email address: suggest@blackwhitegreygroup.com, and we will respond as soon as possible.

11.2 If you are not satisfied with our response, especially when our personal information processing behavior has damaged your legal rights, you can also resolve it through external channels such as filing a lawsuit with a competent people's court, complaining to industry self-regulatory associations or relevant government regulatory agencies. You can also ask us for information about possible applicable complaint channels.