

Cooper Lighting, LLC

Privacy Statement for Halo Home System Product and Services

LAST UPDATE: August 18, 2020, Version 1.0

INTRODUCTION

This privacy statement for Halo Home System Product and Services (the “Privacy Statement”) describes information that Cooper Lighting, LLC and its affiliates, or through its third party vendors, (collectively “Cooper Lighting”, “we”, “our”, and “us”) collect, use, share and store, including personal information. Cooper Lighting cares about the integrity and security of your personal information. We use appropriate technical, organizational and administrative security measures to protect any information we hold in our records from loss, misuse, unauthorized access, disclosure, alteration and destruction. Unfortunately, no company or service can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

This Privacy Statement focuses on the types of personal information we collect through your operation of various Cooper Lighting products and services, including the Halo Home System (collectively, “Cooper Lighting Products”). In this Privacy Statement, the term “Cooper Lighting Products” also includes our Halo Home mobile application. This Privacy Statement is an additional supplement to our Privacy Notice for Customers, Consumers and Other Business Persons (“Notice”), which is located at <https://www.cooperlighting.com/privacy-notice.html>.

We engage in the activities as explained in this Privacy Statement and our Notice because we believe they contribute to a more user-friendly experience when using the Halo Home System and for us to understand you better and to be more efficient as a company. If you have any questions or want to exercise your privacy rights, please contact us through the [Central Privacy Office](#).

TERMS OF USE

The Terms of Use/Legal Notice/End-User License Agreement for the Services is incorporated by reference into this Statement, and can be found [here](#).

1. CONSENT

Consent to Data Collection and Processing

By using Cooper Lighting Products, you agree to allow us to collect and process information as described in this Privacy Statement.

Consent to International Data Transfers

Your personal information may be collected, processed and stored by Cooper Lighting or its service providers in the United States and other countries where our servers reside. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your personal information, in some of these countries may not be equivalent to those in your country. If you are using Cooper Lighting Products in a country or region with laws governing data collection and use that may differ from United States law, you consent to the transfer of your personal data to the United States and other countries where Cooper Lighting operates. If you have any questions about the collection, processing, or storage of your personal information in other countries, please contact our Customer Service department at: privacy@cooperlighting.com.

2. INFORMATION COLLECTED

Information Collected When a User Creates a User Account

When you install Halo Home System devices, you will be directed to download the Halo Home mobile application (“Mobile App”) from the app store that corresponds to your particular mobile device (i.e., Apple, Google, etc.). When you open the Mobile App, you will be asked to register with Cooper Lighting to establish an account for your Halo Home System devices. Establishing an account requires that you provide to Cooper Lighting your designated email address and that you select and enter a password. The Mobile App will then request permission to send you notifications and to allow Halo Home to access your locations while using the Mobile App. You may withhold your consent to receive notifications or to allow Halo Home to access your location, but doing so may impact your ability to fully utilize your Halo Home System devices, including allowing the Halo Home System devices to set sunset/sunrise scheduling (which is dependent upon your location). After registering through the Mobile App, you will be sent a verification email to the email address you provided for the purpose of verifying your account ID. You will be instructed to click on the link in the verification email to complete the registration process and to continue with your Halo Home experience.

In addition to the information collected in the registration process described above, once you have registered, we may ask you for additional information to create your Halo Home user profile such as your telephone number, address, and in some cases, credit card or other billing information for additional services you may order, all of which may be stored by a third party processor with which we have a business relationship. Answering these questions allows us to establish and maintain your user account for the Halo Home System devices that you have purchased and helps us to set up and maintain a lighting program customized to your preferences. After you complete the registration process, your account registration allows you to provide certain additional basic profile information, including photos of your Halo Home System devices and your spaces inside and outside of your home. Names and profile photos may be shown to others in connection with the Halo Home services. You should only use photos you are willing to make public. Your email address will be stored and used as an identifier for you and for communications to you from Cooper Lighting.

Wi-Fi or Network Information

WiFi is not necessary to connect your Cooper Lighting Product to our services in the initial launch of Cooper Lighting Products because the Cooper Lighting Products connect to your computer, smartphone or tablet via a Bluetooth connection. In the future, your Cooper Lighting Products may require connection to an Internet access bridge to connect your Cooper Lighting Product to our services, and in this event, you may need to connect your Cooper Lighting Product to your Wi-Fi network via this Internet access bridge. If this occurs, the Cooper Lighting Product will ask during setup for your Wi-Fi network name (SSID) and password to connect to the Internet. It will save this information on the device, along with your IP address, so that you can access it and control it from your computer, smartphone or tablet, and so that it can communicate with our servers and download software updates. Once connected to your Wi-Fi network, your Cooper Lighting Product regularly sends the data described in this Privacy Statement (excluding your Wi-Fi password) to us so that we can provide you with services.

Environmental Data from the Halo Home System Sensors

The Halo Home System devices may collect data from several sensors built into or in communication with the devices. The Halo Home System, through its associated sensors or other hardware, may collect environmental data such as the number of devices installed in your home, the number of lights and dimmers you have added, your lighting schedules, and in certain instances where such sensor hardware is present, and video and motion sensor information. By recording this information, Cooper Lighting will be able to better understand how you use your Halo Home System devices, provide additional features and services, and help you get the most out of your Halo Home System. Sensor data will be stored in the Amazon Web Services cloud environment. Video data will be stored in the Microsoft Azure cloud environment.

Transmission of Information to Cooper Lighting

There are two pathways for the transmission of information and data about the status of your Halo Home System and use of your Halo Home System to Cooper Lighting. The first is the Mobile App. The second is the Halo Home System itself. Information and data (including changes to the settings for your Halo Home System devices) captured on a Halo Home System device, or entered into the Mobile App, is transmitted to Cooper Lighting when the Halo Home System device or Mobile App is connected to the Internet.

The Mobile App connects to your Halo Home System devices via Bluetooth. You may make changes of certain settings for your Halo Home System using controls built into the Halo Home System devices, or via the Mobile App. If you change settings on a Halo Home System device or using the Mobile App, those changes will be captured on the Halo Home System device or the Mobile App, as applicable, and, as long as your Halo Home System device or the Mobile App is connected to the Internet using a Halo Home bridge device (i.e., a component of the Halo Home System that translates Bluetooth-based transmissions of information and data between the Mobile App, your Halo Home System devices, and your Wi-Fi Network), will be transmitted to Cooper Lighting. If your Halo Home System device is not connected to the Internet, or the Mobile App is not connected to the Internet, the changes that you make to the settings for that Halo Home System device will be stored locally either on the Halo Home System device or the Mobile App. When your Halo Home System device, or your Mobile App, is connected to the Internet, the changes that you make to the settings for the Halo Home System device will be transmitted to Cooper Lighting via the Internet.

Technical Information and Lighting Usage Information

In order to improve your experience over time and help troubleshoot any problems you may encounter with the Halo Home System, we record information and data including your Halo Home System device model and serial number, firmware version and technical information, such as error logs, power status, battery charge level, and whether device features are working properly. When you install Halo Home System devices and they are connected to the Internet, information regarding your Halo Home System set up will be transmitted to Cooper Lighting to allow Cooper Lighting to track the number of Halo Home devices per location, the groupings of Halo Home devices within a location, the Halo Home scenes within a location, a Halo Home System device index (including product, Media Access Control (MAC) address, firmware version and firmware update schedule), a record of cloud-to-cloud integrations with your Halo Home System devices (e.g., cloud-based voice assistants), a list of Halo Home System objects per location, a record of schedule and bridge creations, and an Halo Home System device update status record. This information enables Cooper Lighting to understand your usage of the Halo Home System to offer you features and services based on your usage.

Information Shared Among Multiple Cooper Lighting Products

If you have multiple Cooper Lighting Products interfacing with one another, the products will communicate certain information to each other, such as basic operational information (e.g., on-off control statements), user command information (e.g., trim statements for dimmers), and repeating information necessary to deliver that information to Cooper Lighting via the Internet. This communication may occur locally among connected devices (both Cooper Lighting Products and third party devices). Communications may also occur between Cooper Lighting Products and your mobile device or Mobile App, or among Cooper Lighting's servers.

In addition, Bluetooth-enabled Cooper Lighting Products may broadcast an identifying signal wirelessly. This is used to connect with your Bluetooth-enabled devices (such as a smartphone or a tablet) to deliver certain features.

Remember that when you visit our websites, we collect personal information as described in our Notice located at: <https://www.cooperlighting.com/privacy-notice.html>.

Like most Internet sites, we routinely record log entries (including information such as your IP address) and technical information (such as your browser type and version) when your browser, mobile device, or Cooper Lighting Product contacts our servers.

3. THIRD PARTY PRODUCTS AND SERVICES

If I connect third party products and services to my Cooper Lighting Products, will information be shared?

When you choose to connect third party products and services to your Cooper Lighting Products, you may be shown details about any proposed exchanges of data between Cooper Lighting and the third party that is providing the product or service. In some cases, Cooper Lighting or the third party will instead (or also) ask for permission to control the products that you have connected. Your activation is required through the Halo Home System mobile application or

a third party mobile application to allow these exchanges or requests for control and the connection between a Cooper Lighting Products and a third party product or service will not be possible without your activation. The only such information that Cooper Lighting may share with third parties currently is the way to access and control a Halo Home System device.

4. HOW WE MAY USE INFORMATION WE COLLECT

Information that you choose to share with a third party is governed by that third party's privacy policy while in that third party's possession. For example, if you select an outside party for the installation or service of Cooper Lighting Products and share your personal information with that party, we cannot control the collection, storage or sharing of information collected by that party. Always check the privacy policies for any company that collects your personal information.

We may also receive information from our partners and other sources and combine that with the information in your Cooper Lighting account. Personal information about you that Cooper Lighting receives from third parties will be processed and stored by Cooper Lighting and will be treated in accordance with this Privacy Statement. This information may be processed in the same ways as any other data that is part of your Cooper Lighting account.

Uses of information and data may include:

Contact Information

“Contact Information” means information that allows someone to identify or contact you or any user authorized by you to contact or interface with your Cooper Lighting Products (e.g., your name and email address). Unless otherwise stated in this Privacy Statement, we do not share your Contact Information with anyone without your permission. However, we may use your Contact Information to market Cooper Lighting Products and third-party products and services to you via various methods. You can stop the delivery of future promotional emails from us by following the specific instructions in the advertising emails you may receive. These choices do not apply to the receipt of mandatory service communications that are considered important to the Cooper Lighting Products or services you receive.

Service Information

“Service Information” means information necessary or useful to us in providing the Cooper Lighting Products to you (e.g., Cooper Lighting Products you use and how/when you use them). This information is used by us for operation of the Cooper Lighting Products, to provide services or information to you, to maintain the quality of our products and services, and to provide general statistics regarding use of the Cooper Lighting Products. We may also use Service Information for customer support, Cooper Lighting Product restoration, research and development activities for new products and services, and other similar purposes. Finally, we may provide certain Service Information to selected third parties, such as our business partners (e.g., for inbound API calls such as from cloud-based voice assistants), to improve the Cooper Lighting Products or the services we provide, for marketing purposes, or other related purposes.

Usage Information

“Usage Information” is information including, but not limited to, GPS/geolocation information, lighting usage data, as well as information about the interaction of your lighting system and third party devices, the time of events in your home, and your use of the functions and features available in the Cooper Lighting Products. We receive this type of information from your Cooper Lighting Products or through the Mobile App and we may collect this information and other similar Usage Information for other products we may offer now or in the future. Usage Information may also include your IP address, browser type, domain names, access times and referring website addresses and Wi-Fi service set identifier. This information is used by us for the operation of the Cooper Lighting Products, to maintain quality of the Cooper Lighting Products, and to provide general statistics regarding use of the Cooper Lighting Products. We may also use Usage Information for customer support, system restoration, and research and development activities for new products and services, and other purposes similar to the foregoing. Finally, we may use certain Usage Information for marketing purposes or provide certain Usage Information to selected third parties, such as our business partners, for marketing purposes, where we have obtained your specific consent.

Anonymized Information

Sometimes we may “anonymize” your information by removing any identifier that can be associated with you. Anonymized information helps us develop reports and analyses about how our customers use the Cooper Lighting Products and for other research such as behavioral inferences. We may publicly share or sell anonymized information and reports and analyses based on anonymized information. We may disclose aggregated, anonymized information, and analyses and reports derived from such information to third parties including utilities, our service providers, suppliers, advertisers, merchants, consumer and market research companies and other organizations.

We may share non-personal information (for example, aggregated or anonymized customer data) publicly and with our partners. This information may also be shared with other users to help them better understand their lighting usage compared to others in the Cooper Lighting community, raise awareness about safety issues, help us generally improve our system, or other informational purposes. We may also share non-personal information with our partners; for example, we may aggregate and de-identify data to help Cooper Lighting design better lighting products. We take steps to keep this non-personal information from being associated with you, and we require our partners to do the same.

5. WITH WHOM DO WE SHARE YOUR INFORMATION?

We may share your Personal Data for business purposes with entities other than the Cooper Lighting entity that originally collected it, including the categories of recipients described below:

- Affiliates and subsidiaries: Due to our global nature, we may share your Personal Data, with our parent company Signify N.V. and its affiliates, subsidiaries, business units and other companies that share common ownership for the purposes described above.
- Third party service providers: We may share your Personal Data with third party service providers working on behalf of Cooper Lighting in order to provide the Services you request or support our relationship with you, such as cloud services or technical support services.
- For legal, security and safety purposes: We may share your Personal Data with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our Terms of Use and other agreements; and to protect our rights and the property or safety of Cooper Lighting, our users, or third parties.
- In connection with a transaction: If we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy, we will share your Personal Data with that entity.

The following are examples of situations where we may share your personal information:

- With your consent.
- For external processing and storage, and management of the Halo Home System: We utilize third party vendors, service providers and technicians who help with some of our data and information processing and storage. We also utilize a third party cloud services vendor that assists Cooper Lighting in connection with the provision of Halo Home products and services and helps Cooper Lighting to manage the operation of the Halo Home System and to customize Halo Home System product and service offerings. We may also utilize third party vendors to assist with monitoring our servers for technical problems and data security and privacy compliance. These third party vendors (as well as Cooper Lighting employees) may access certain information about you or your account in line with this work, but are not permitted to use this data for purposes unrelated to Cooper Lighting Products and services. We also have strict policies and technical procedures in place designed to prevent unauthorized employee access to your personal information and data.

6. RETENTION AND DELETION OF INFORMATION

We generally store your information or data on our servers or on the servers of our third party vendors until the later of (i) the date you request that we delete or edit it, the date on which you are no longer a Halo Home System customer, or (iii) as long as is required by applicable law.

If you cease to be a Halo Home System customer, Cooper Lighting will deactivate your account and will, upon receipt of a written notice from you, request that our third party vendors delete your account information from their servers. Because of the way we maintain certain services, however, after your information is deleted, backup copies may linger for some time before they are deleted, and we may retain certain data for a longer period of time if we are required to do so for legal reasons.

7. NOTICE TO CALIFORNIA RESIDENTS

This section applies to California Residents.

As described in sections 2 and 4 of this Privacy Statement, we might collect personal information including identifiers, characteristics of protected classifications under California Federal Law, commercial information, internet or other network activity information, geolocation information, audio, electronic, visual or similar information, and inferences drawn from any of the information identified above to create a profile about a consumer.

As described in section 5, personal information we collect from consumers might be shared for business purposes with third parties. We might have disclosed all of the categories of personal information listed above, based on the use case, for a business purpose in the past 12 months.

We do not sell your personal information.

As a California resident you have certain rights, subject to legal limitations and applicable exceptions, regarding the collection, use, and sharing of your personal information. Those rights are in particular:

- **The Right to Know.** You have the right to request information about the categories of personal information we have collected about you, the categories of sources from which we collected the personal information, the purposes for collecting the personal information, the categories of third parties with whom we have shared your personal information, and the purpose for which we shared your personal information (“Categories Report”). You may also request information about the specific pieces of personal information we have collected about you (“Specific Pieces Report”).
- **The Right to Delete.** You have the right to request that we delete personal information that we have collected from you.
- **The Right to Opt-Out.** You have the right to opt out of the sale of your personal information.

In accordance with applicable law, we will not discriminate against you for exercising these rights. You may use an authorized agent to exercise your rights on your behalf. If you are making any of the requests above through an authorized agent, we will request written authorization from you and will seek to verify as described above or we will accept a legal Power of Attorney under the California Probate Code to the authorized agent.

You can exercise your right at any time by contacting us by sending an email to [Central Privacy Office](#), by calling +1-866-461-7819 or by using this [online form](#).

In order to exercise your rights, we will need to obtain information to locate you in our records or verify your identity depending on the nature of the request. If you are submitting a request on behalf of a household, we will need to verify each member of the household in the manner set forth in this section. Therefore, based on the request we might reach out to you for further information.

We will respond to a Request to Opt-Out within 15 days. We will respond to Requests to Delete and Requests to Know within 45 days, unless we need more time in which case we will notify you and may take up to 90 days total to respond to your request.

8. CHANGES TO THIS PRIVACY STATEMENT

Please note that this Privacy Statement may change from time to time. We will provide notice of any material changes on the website, through the Mobile App, or by contacting you.

9. CONTACT US

If you have any questions about this Privacy Statement and/or Notice, please contact our [Central Privacy Office](#).