

PRIVACY NOTICE

Publication/last update date: 29th December 2023

This privacy notice (the "**Privacy Notice**") applies to the processing of your personal data (including in particular the collection, use, disclosure and transfer of personal data) carried out by Legrand in the context of your access to Legrand services (the "**Services**") provided through Galaxy CELS application (the "**Application**") compatible with Legrand Galaxy Exit and emergency lights (the "**Products**").

For the purpose of this Privacy Notice, the term "**Applicable Data Protection Regulation**" means the European regulation no. 2016/679 of 27 April 2016 (the "**General Data Protection Regulation**" or "**GDPR**") as well as:

- with respect to the processing carried out by NETATMO SAS and/or LEGRAND FRANCE, the French law no. 78-17 of 6 January 1978 and its application decree no. 2019-536 of 29 May 2019 (the "**French Data Protection Legislation**");
- with respect to the processing activities described in this Privacy Notice relating to individuals located in Singapore, the Personal Data Protection Act 2012 (the "**PDPA**") and its subsidiary legislation (the "**Singapore Data Protection Legislation**").

Any reference to the Applicable Data Protection Regulation shall be deemed to include any subsequent replacement of or amendment to the Applicable Data Protection Regulation (or part of the same).

IDENTITY OF THE DATA CONTROLLERS

The processing of personal data described in this Privacy Notice are implemented under the joint responsibility of the following companies belonging to the LEGRAND group ("**LEGRAND**" or "**we**" (and its derivatives)):

LEGRAND FRANCE

128, avenue du Maréchal de Lattre de Tassigny
87045 Limoges Cedex (France)

For more information regarding the data processing, you can contact us using the contact information provided in the "CONTACT US & CONTACT OUR DPO" section.

ACCOUNT CREATION

To benefit from our offer (e.g. to use the Application), you need to be registered by creating a personal account (the "**Account**").

When creating the Account, you will be asked to enter an email address, a name, the country from where you are using the Services and a password (hashed). Please note that these log-in details are both required and necessary to provide the Services that you are requesting. If a mandatory field is not filled in, your Account cannot be created and you will not be able to benefit from the Services / Products.

COLLECTED DATA, PURPOSES OF THE PROCESSING AND LEGAL BASIS

By accepting the general terms of use of the Application, you give your consent to the collection, use, disclosure, transfer, and more generally, processing of your personal data in the manner described in the Privacy Notice. For the avoidance of doubt, the legal bases set out below have been determined in the light of the requirements set out in the GDPR, the French Data Protection Legislation and are without prejudice to other additional requirements or legal basis that may be required to comply with the applicable laws of Singapore.

The personal data that you provide to us

Type of personal data	Purposes of the processing	Legal basis
Email address* Password* Name* Country*	Creation and management of your Account	Performance of the contract based on the general terms of use of the Application**
	Creation of your customer record on the LEGRAND customer management tool (Salesforce)	Our legitimate interest in the ongoing improvement of our customer relations
	Sending communications, surveys and/or quizzes in connection with your Application, Products and/or Services	Our legitimate interest in continuously developing and improving our Products, Services and customer relations
	Direct marketing and customized business development based on analytical profiling (if any) We will process your email address in order to send you offers, new Products and/or Services, news and promotions relating to new Products and/or Services offered by the LEGRAND group companies.	Your consent
Areas of interest identified from the Products used and/or purchased	Analytical profiling in order to customize our business communications We can send you communications, surveys and/or quizzes in connection with your Application, Products and/or Services	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations

Type of personal data	Purposes of the processing	Legal basis
Topology of the project (Site name / address / Contact name / estimated number of SPU, etc.)* and device configuration	Configuration of the installation and customization of the user experience	Performance of the contract based on the general terms of use of the Application**
Last name, first name, email address, request to exercise the rights, expression of consent, withdrawal of consent,	Notifications done pursuant to the General terms of use of the Application	Performance of the contract based on the general terms of use of the Application**
opposition request, request to unsubscribe from business communications	Processing of your requests to exercise your rights Management of consent and withdrawal of consent, management of opposition requests against business prospectings and profiling Sending of information regarding changes made to the Privacy Notice	Compliance with our obligations resulting from the Applicable Data Protection Regulation

*The collection and processing of these personal data are mandatory and necessary for the creation of your Account and allow access to the relevant Service.

**The general terms of use of the Application are available in your account.

Data collected and stored in Galaxy Cloud database to you use the Application, the Services and/or the Products

Type of personal data	Purposes of the processing	Legal basis
E-mail	Used to invite a user to Galaxy Cloud	Performance of the contract based on the general terms of use of the Application*
Username (login) / name / surname	Information of an account on the local server	Performance of the contract based on the general terms of use of the Application*
Site name / address / contact name / estimated number of spus / server software version	Information stored when registering an offline site for warranty	Performance of the contract based on the general terms of use of the Application*
Site name / Number of spus (total / online / 6-month test passed) / time zone	Information stored for an online site	Performance of the contract based on the general terms of use of the Application*

*The general terms of use of the Application are available in your account.

Data collected by Galaxy Cloud from the local server to you use the Application, the Services and/or the Products

Type of personal data	Purposes of the processing	Legal basis
Number of Spus (total / online / 6-month test passed)	used to update the site information in the database	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations
Site name / time zone	used to update the site information in the database	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations
Username (login) / name / surname	used to update the user list in the database	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations
Test campaign information (duration / date / type, spu ID list)	Used to create or display a test campaign	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations
EM test report (date / test duration)	Used to create or display an EM test report	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations
SPU (building / floor / area / name / family / test in progress / status)	Used to display SPU information	Our legitimate interest in continuously developing and

Type of personal data	Purposes of the processing	Legal basis
		improving our Services, our communications and commercial relations
Maintenance operation (spu ID / date / description / username / maintenance company / mains switch counter)	Used to display a maintenance operation	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations
Test result (spu ID / type / duration / date / result)	Used to display a test result	Our legitimate interest in continuously developing and improving our Services, our communications and commercial relations

Balancing of legitimate interests

When we indicate in the Privacy Notice that we are relying on our legitimate interests to process your personal data, this means that we consider that our legitimate interests are not overridden by your interests or fundamental rights and freedoms, in light of the circumstances and measures that we take to protect your privacy. You can obtain more information about this analysis (the "**Balancing test**") on request, by contacting us using the contact information provided in the "CONTACT US & CONTACT OUR DPO" section.

RECIPIENTS HAVING ACCESS TO THE DATA

Only the following recipients will have access to your personal data, within the limits set out below:

- The internal departments of LEGRAND FRANCE established in France and Australia:
 - The Research and Development (R&D) teams responsible for the Application have access to: the personal data of your Account (email address only), the personal data relating to measurement collected through the Products and the personal data collected by third-party cookies and services necessary for the proper performance of the Application and audience measurements (see the COOKIES AND SIMILAR TECHNOLOGIES section for further details);
 - The marketing teams, responsible for direct marketing and business prospecting operations, have access, where relevant, to: the personal data of your Account (email address and Products only);
 - The teams from our customer service department have access to: the personal data of your Account (email address only), the personal data collected as part of the use

of the Products for support purposes when you request it and the history of your conversations with our customer service department.

- The internal departments of LEGRAND, established in France:
 - The administrators of LEGRAND's cloud which hosts all of your personal data;
 - The Research and Development (R&D) teams responsible for the Application have access to the personal data of your Account (email address only), the personal data relating to measurement collected through the Products and the personal data collected by third-party cookies and services necessary for the proper performance of the Application and audience measurements (refer to the COOKIES AND SIMILAR TECHNOLOGIES section);
 - The marketing teams, responsible for direct marketing and business prospecting operations, have access, where relevant, to: the personal data of your Account (email address only), the personal data collected as part of the analytical profiling described above, the personal data collected through the use of cookies and third-party audience measurement services and by the advertising identifiers (refer to the COOKIES AND SIMILAR TECHNOLOGIES section);

- The service provider named Microsoft AZURE, responsible for hosting the LEGRAND cloud architecture and the personal data centers which are located in the Netherlands. For your information, your personal data may be transferred to Microsoft AZURE for hosting purposes in the United States of America;

- The service provider ADOBE SYSTEMS SOFTWARE IRELAND LIMITED, established in Ireland, for the purpose of sending you direct marketing communications, where relevant;

- The service provider named SALESFORCE, supplier of the LEGRAND CRM client base management tool, in order to create your customer card. For your information, your personal data may be transferred to SALESFORCE for hosting purposes in the United States of America;

- The service provider named Creoo Studio s.r.l., established in Italy, for the purpose of distributing our newsletter, where relevant;

- The service provider NTTData Italia S.p.A., established in Italy, for the purpose of analyzing technical support tickets from the customers;

- The service provider AZCOM Technology S.r.l., established in Italy, for the purpose of analyzing technical support tickets from the customers;

- GOOGLE, which has access to the personal data relating to your browsing when you accept it through the Application or through our cookies banner on the web Application. For your information, your personal data may be transferred to GOOGLE for hosting purposes in the United States of America. To learn more, please refer to the "COOKIES AND SIMILAR TECHNOLOGIES" section below;

You are hereby informed that the aforementioned recipients of personal data are subject to a confidentiality obligation and have undertaken to use your personal data in accordance with our contractual arrangements. Where your personal data are transferred outside the European Economic Area ("EEA"), we have notably put in place security and confidentiality safeguards that are deemed appropriate in the light of the GDPR. For your information, you may obtain access to these safeguards, on request, by contacting us at the address indicated in the "CONTACT US & CONTACT OUR DPO" section.

Analysis of Products measurements

LEGRAND may conduct analysis on the basis of the measurement information collected through LEGRAND Products. LEGRAND may then share these measurements or analysis with advertisers, researchers, statistical and business marketing partners, publications and weather providers for the production of statistical studies. For the avoidance of doubt, the data collected and processed by LEGRAND for this purpose: (i) only include technical measurements directly collected from the Products, (ii) are anonymised and encrypted and (iii) are not associated nor combined with your personal data by LEGRAND.

DATA RETENTION PERIODS

We process your personal data for the following durations:

Purpose of the processing	Retention duration of the personal data
<ul style="list-style-type: none"> Commercial prospecting and direct marketing activities via email or directly on the Application 	<p>Term of our contractual relationship, which ends either (i) by sending LEGRAND a request to delete the Account and the related data (see "CONTACT US & CONTACT OUR DPO" section), or (ii) upon expiration of the grace period that you are given to reactivate your Account as of your request to unsubscribe (in accordance with the general terms of use available in your account).</p> <p>Furthermore, your Account will be deleted if it remains inactive for three (3) consecutive years since its last use, unless you object to this deletion.</p>
<ul style="list-style-type: none"> Notifications or alerts on your Application 	<p>Term of our contractual relationship, which ends either (i) by sending LEGRAND a request to delete the Account and the related data (see "CONTACT US & CONTACT OUR DPO" section), or (ii) upon expiration of the grace period that you are given to reactivate your Account as of your request to unsubscribe (in accordance with the general terms of use available in your account).</p>

Purpose of the processing	Retention duration of the personal data
	Furthermore, your Account will be deleted if it remains inactive for three (3) consecutive years since its last use, unless you object to this deletion.
<ul style="list-style-type: none"> • Surveys and quizzes • Competitions 	Two (2) years following the personal data collection
<ul style="list-style-type: none"> • Analytical profiling in order to customize our business communications, from the Products used and/or purchased by you 	Term of our contractual relationship, which ends either (i) by sending LEGRAND a request to delete the Account and the related data (see "CONTACT US & CONTACT OUR DPO" section), or (ii) upon expiration of the grace period that you are given to reactivate your Account as of your request to unsubscribe (in accordance with the general terms of use available in your account). Furthermore, your Account will be deleted if it remains inactive for three (3) consecutive years since its last use, unless you object to this deletion.
<ul style="list-style-type: none"> • Language selected for the device in order to adapt the content of our communications 	Term of our contractual relationship, which ends either (i) by sending LEGRAND a request to delete the Account and the related data (see "CONTACT US & CONTACT OUR DPO" section), or (ii) upon expiration of the grace period that you are given to reactivate your Account as of your request to unsubscribe (in accordance with the general terms of use available in your account). Furthermore, your Account will be deleted if it remains inactive for three (3) consecutive years since its last use, unless you object to this deletion.
<ul style="list-style-type: none"> • Evaluation of the effectiveness of our business campaigns using audience measurement tools installed in the Application 	Google Analytics: thirteen (13) months as from the date on which the measurement tool is placed in the Application

Purpose of the processing	Retention duration of the personal data
<p>Account management and configuration of the Application:</p> <ul style="list-style-type: none"> • Creation and management of your Account, conditioning your access to our Services • Configuration of the installation and customization of your user experience • Creation of your customer card on the LEGRAND customer management tool (Salesforce) 	<p>Term of our contractual relationship, which ends either (i) by sending LEGRAND a request to delete the Account and the related data (see "CONTACT US & CONTACT OUR DPO" section), or (ii) upon expiration of the grace period that you are given to reactivate your Account as of your request to unsubscribe (in accordance with the general terms of use available in your account). Furthermore, your Account will be deleted if it remains inactive for three (3) consecutive years since its last use, unless you object to this deletion.</p>

Purpose of the processing	Retention duration of the personal data
<p>Processing of the personal data collected when you use the Application, the Services and/or the Products:</p> <ul style="list-style-type: none"> • Registration of the Products, provision of the Services, Maintenance of the Products • Identification of the available Wi-Fi networks • Measurements data collected by the Products as defined above • Customization of the language on your Application • Customization of the information applicable to your geographical area • R&D analysis in order to improve the content and functionalities of our Products and Services • Configuration of the installation and customization of the user experience • Technical support • Identification and deletion of an inactive Account 	<p>Term of our contractual relationship, which ends either (i) by sending LEGRAND a request to delete the Account and the related data (see "CONTACT US & CONTACT OUR DPO" section), or (ii) upon expiration of the grace period that you are given to reactivate your Account as of your request to unsubscribe (in accordance with the general terms of use available in your account). Furthermore, your Account will be deleted if it remains inactive for three (3) consecutive years since its last use, unless you object to this deletion.</p>
<ul style="list-style-type: none"> • Processing of your requests to exercise your rights • Sending of information regarding changes made to the Privacy Notice • Management of consent and withdrawal of consent, management of oppositions against receiving business prospecting and profiling, management of requests to unsubscribe from business communications 	<p>Three (3) consecutive years as from the receipt of the request regarding the exercise of your rights or the sending of information regarding changes made to the Privacy Notice</p>

Please note that the above durations remain subject to mandatory data retention requirements that may apply to us and, where relevant for the establishment, exercise or defence of legal claims, to the applicable statutory limitation periods.

Lastly, we draw to your attention that uninstalling our Application does not automatically imply the deletion of your personal data or withdrawal of your consent. To do so, you must

send a voluntary deletion or consent withdrawal request to LEGRAND (see "CONTACT US & CONTACT OUR DPO" section) or make a request to unsubscribe (in accordance with the general terms of use available in your account).

THIRD-PARTY SERVICES PARTNERS

You have the opportunity to subscribe for services provided by third-party partners that result from the sharing of our APIs. When you decide to use these third-party services partners, you must grant a delegation for access to the personal data available on the LEGRAND cloud, since we do not make your personal data available to third-party services partner without your express consent. This subscription shall also be subject to acceptance of specific general terms of use from the third-party services partner. In this case, the user recognizes that LEGRAND does not possess and has no control over these third-party services partners and that it is not responsible for the processing of personal data implemented by these third-party services partners. For more information about how these third-party services partners process your personal data, we recommend that you refer to the concerned third-party services partner's privacy notice.

DATA SECURITY

We have implemented adequate physical, electronic and administrative protection security measures in accordance with applicable regulations to protect your personal data. However, we wish to draw users' attention to the potential risks regarding confidentiality of the personal data related to internet usage. In particular, users are responsible for putting in place or ensuring the existence of means securing their personal internet network, as well as for ensuring the proper configuration of the box connected to the internet access provider, and other wireless access means (e.g. WIFI, 4G, etc.).

USERS' RIGHTS

We intend to keep your personal data accurate, complete and up-to-date. In order to do so, you can visit the "MY ACCOUNT" section of your Application.

Pursuant to the Applicable Data Protection Regulation, you benefit from the following rights in relation to the processing of your personal data:

- **Right of access:** you can ask to obtain a copy of your personal data from us, as well as to receive information regarding the processing of your personal data (such as the categories of personal data that are processed, the purposes of the processing, the categories of recipients to whom the personal data is communicated, the retention period of the personal data);
- **Right to rectification:** you can ask us to correct, complete, update your personal data if it is inaccurate, incomplete, ambiguous and/or expired;
- **Right to erasure:** you can ask us to delete your personal data under certain circumstances (for example, in application of Article 17 of the GDPR, if your personal data is no longer necessary for the purposes for which they were collected or are processed; or if you have

withdrawn your consent for processing your personal data, as long as the prior consent was the legal basis for their collection and processing and there is no longer any other legal basis justifying the latter);

- **Right to restriction:** you can ask us to limit the processing of your personal data under certain circumstances (for example, in application of Article 18 of the GDPR, when you contest the accuracy of the personal data, the time needed for us to verify this point);
- **Right not to be subject to certain specific processing:** you can ask us, in application of Article 22 of the GDPR, not to subject you to a decision based exclusively on automated processing, including profiling, producing legal effects concerning you or significantly affecting you in a similar manner;
- **Right to object: you may object to the processing of your personal data for a reason relating to your specific situation (in accordance with, and within the limits of, Article 21 of the GDPR). Where personal data are processed for direct marketing purposes, you can object at any time to such processing, including where it includes profiling activities (to the extent that they relate to such direct marketing);**
- **Right to portability:** you can ask to receive your personal data – when they are processed on the legal basis of your consent or if necessary, for the performance of a contract – in a structured, commonly used and machine-readable format, and request that we transmit them to another data controller (for example, another service provider);
- **Right to withdraw consent:** you can withdraw your consent at any time, without providing a reason, for all of the processing activities described in the Privacy Notice for which the legal basis for processing is your consent;
- **Right in case of death:** pursuant to article 85 of the French Data Protection Legislation, you can define guidelines relating to the preservation, erasure and communication of your personal data by LEGRAND FRANCE after your death. These guidelines may be general or specific. The general guidelines relate to all of your personal data and can be recorded with a trusted digital third party certified by the French supervisory authority. The specific guidelines relate to the processing of your personal data described in this Privacy Notice and can be recorded with us.

To exercise any of these rights, you may send your request at any time, using the contact information provided in the "CONTACT US & CONTACT OUR DPO" section of this Privacy Notice. Requests will be processed as long as you can validly prove your identity and the subject of your request is clearly identified. Requests will be processed promptly, and in any case within no more than one (1) month from receipt of the request. If needed, this period may be extended by two (2) months, depending on the complexity of the request and number of requests. In this case, we will inform you of the reasons for this extension. No payment will be required to exercise your rights, except in case of clearly unfounded or excessive request. In this case, we also reserve the right not to grant your request.

In addition to the rights described above, you may lodge a complaint at any time with a competent supervisory authority. For instance, under the GDPR, you may lodge such a complaint in the country in which you reside or work (if relevant) or where the alleged breach has occurred, if you feel that our processing of your personal data breaches the Applicable Data Protection Regulation. In France, the supervisory authority is the *Commission Nationale de l'Informatique et des Libertés* (the "CNIL"). In Singapore, the supervisory authority is the Personal Data Protection Commission (the "PDPC").

COOKIES AND SIMILAR TECHNOLOGIES

When you use the Application via a web browser, we place cookies and similar technologies on your terminal (that is to say, the device that you use to browse on the Internet: computer, mobile phone, tablet), for various reasons.

MINORS

In offering its information services (that is to say, the Application), LEGRAND does not target users that have not reached the legal age of majority applicable in their country.

However, access to the Application is not reserved for adults, since it does not include content prohibited to minors.

The Application does not intentionally collect or use personal information regarding minors. If information has been collected on a minor by LEGRAND, the legal representative of the minor may contact the Data Protection Officer at LEGRAND (using the contact information provided in the "CONTACT US & CONTACT OUR DPO" section) in order to, where relevant, correct, modify or delete this information, object to or withdraw consent for the processing of this information (refer to "USER'S RIGHTS" section).

MODIFICATION OF THE PRIVACY NOTICE

You can see the date of the last update to the Privacy Notice by referring to the "Last update" note at the top of the Privacy Notice.

When we are considering making substantial changes to this Privacy Notice (for example, a change to the processing purposes of the personal data, the identity of one or several data controllers, or the manner in which you can exercise your rights), we will inform you before these changes become effective, via email (and also, where possible, via an in-app notification). This information is accompanied by an "I understand" button, which we ask you to click on in order to confirm that you have understood the changes.

You are hereby informed that you can consult this Privacy Notice at any time on our website "<https://www.legrand.com.sg/sites/default/files/galaxy-privacy-notice-sg-29dec2023.pdf>", which is accessible from your Application.

CONTACT US & CONTACT OUR DPO

By email:

Via the online form on the website

[Contact Us \(legrand.com.sg\)](https://legrand.com.sg)

By mail:

Service Consommateurs Legrand

128, avenue du Maréchal de Lattre de Tassigny

87045 Limoges Cedex - France

Our DPO:

Data Protection Officer – Julie Celma

128, avenue du Maréchal de Lattre de Tassigny

87045 Limoges Cedex – France

fr-sm-data-protection-officer@legrand.com