

PRIVACY STATEMENT

This Privacy Statement describes how we process personal data related to the Contest "**Shelly Smart Home Contest!**" ("the Contest")

"Personal data" is information that identifies or can reasonably be linked directly or indirectly to an identifiable person. For purposes of this Privacy Statement, "personal data" and "personal information" have the same meaning and are used interchangeably.

The personal data controller is ALLTERCO ROBOTICS EOOD, UIC: 202320104, having its seat and registered address in the city of Sofia, No 103 Cherni Vrah Blvd.

The Data Protection Officer (DPO) will respond to all your queries regarding the processing and protection of personal data. You can contact the DPO via email at the following address: dpo@alterco.com

Data subjects, whose data can be processed – individuals – participants or their representatives who have submitted Projects for participating in the Contest "**Shelly Smart Home Contest!**" by **fulfilling a submission form with a link to their Projects on the <https://shelly.cloud/contest> website**. ALLTERCO ROBOTICS EOOD as an Organizer of the Contest and administrator of the <https://shelly.cloud/contest> website is processing personal data.

We obtain personal data directly from you when you send us a fulfilled submission form with for entry in the Contest or when you interact with our <https://shelly.cloud/contest> website or when you vote for specific Project by entering your e-mail.

We might also obtain certain data about you from third parties such as the social media, DIY websites/platforms where you have published your Project and to the extent you have shared such data publicly. We do not obtain further data from these social media/websites/platforms than the information which you have made publicly available.

1. Types of personal data that you provide us in relation the Contest

1.1. Identifiers of participants, such as:

- Name(s);
- E-mail;
- Smart Home Project's name;
- Short description of the Smart Home Project;
- Identifiers of your Shelly products (only if you have made these visible on your photos, videos of further Project Content);
- Direct link to the social media/ platform where the Project is submitted.);
- Any further personal data that you have made publicly available on the link to your Project

We process these data based on the Official Contest Rules for "Shelly Smart Home Contest!" and your agreement thereto.

1.2. Identifiers on social media or DIY platforms

- Personal data regarding the Participant: Name(s), Smart Home Project's name, short description of the Smart Home Project, the direct link to the social media/ platform where the Project is submitted, as well any further personal data available on the link.
- Personal data regarding the profile that has been made public by the social media user such as name, profile picture, comments etc. When you post information or photos/videos on our social media page or comment on any of our posts, the information you post and your username are publicly available. This information is accessible to anyone who visits the specific social media. The Organizer shall not be responsible for the way these third parties use the information you have posted on the social media.

This information is accessible to anyone who visits the <https://shelly.cloud/contest> website. The Organizer shall not be responsible for the way these third parties use the information you have voluntarily provided by fulfilling the submission form for the Contest.

2. Purposes of personal data processing:

2.1. For Running and administering the Contest:

- Processing your entry in the Contest;
- Approving the eligibility of you and your Projects;
- Assessing your Project;
- Publishing your Smart Home Project's name, short description of the Smart Home Project, the direct link to the social media/ platform where the Project is submitted on our <https://shelly.cloud/contest> website for voting for the ranking;
- Contacting you or your representatives about your participation, including but not limited to your Project and/or your Project Content and/or your reward;
- Providing you information about the Contest;
- Proof of a legal vote under Official Contest Rules;
- Sending you a reward;
- Announcing the rewarded Projects;
- Sending you suggestions, offers, promotions, newsletters, surveys, or other information in furtherance only with your explicit consent

2.2. For managing our <https://shelly.cloud> website

2.3. For protecting our legitimate interests

3. Third parties to whom we provide your data:

3.1. State bodies and authorities in relation to checks performed by them in accordance with statutory requirements and limitations;

3.2. Persons affiliated with ALLTERCO ROBOTICS EOOD in connection to the use of shared technical and human resources, transformations and others;

3.3. Law enforcement, legal counsel, or other reasonably necessary when we have a good faith belief that the disclosure is necessary to prevent or respond to fraud or software piracy, defend ourselves against attacks, or protect the rights, property, and safety of our company, other participants and the public;

3.4. Persons to whom we are required by law to provide information, such as according to subpoena or a court order;

3.5. Facebook Inc. or the Irish subsidiary Facebook by sharing the link to your Project on our business page on Facebook or the Facebook group Shelly support group (English Version) as a part of the marketing campaign of the Contest.

3.6. Marketing agencies and suppliers of services concerning sending of messages for marketing and advertising;

By entering the Contest you agree that your Smart Home Project's name, short description of the Smart Home Project, the direct link to the social media/ platform where the Project is submitted will be shared on our <https://shelly.cloud/contest> website, business page on Facebook or the Facebook group Shelly support group (English Version) and made public for votes. If you do not want the information in the previous sentence to be published on our <https://shelly.cloud/contest> website you should not enter the Contest.

When making a post or a comment on our Facebook page or interacting with it in any other way, including when sending personal messages to the page, please consider carefully the information you share.

We may also disclose your personal information to other parties when we have your consent to do so or when you direct us to, for any purposes requested or permitted by you.

We may share aggregated, anonymous, or de-identified demographic, statistical, and other information regarding the Contest for marketing and other purposes. Such information will not specifically identify any particular participant.

4. ALLTERCO ROBOTICS EOOD is processing Data within the following time limits:

4.1. Data provided directly by you in relation to the Contest - for the period of the Contest and one month thereafter;

4.2. Data provided based on consent – until its withdrawal by way of written application directed to ALLTERCO ROBOTICS EOOD at the management address of the company. In cases of consent granted for direct marketing and advertising, you can withdraw your consent with a click on the link “unsubscribe” or by sending an e-mail to the address for cancellation stated in the notification.

4.3. Data that are publicly available on the link to your project after sharing it by fulfilling the submission form of the Contest – until the deletion of the Project. Please take into account that your Project, the Project Content and any related thereto data will still be publicly available in the specific social media, DIY website/platform where you have published these until you delete

them or according to the terms and conditions of the relevant social media, DYI website/platform.

4.4. Data of importance for administrative proceedings, claims, investigations – until their closing with a final act.

5. Your rights as regards your data:

5.1. Right of access, including the right of a copy of the data that are being processed:

At any given time, you have the right to request information regarding your personal data which we store. You can contact us and based on a written request and proving your identity your data will be provided to you.

5.2. Right to correct inaccurate data

You have the right to request the correction of your data if the data is inaccurate, including supplementing incomplete data

5.3. Right of erasure („The right to be forgotten“) in the following cases:

1. Removing the need for processing;
2. Withdrawal of consent when processing is based on consent;
3. Illegal processing of data;
4. Statutory obligation for erasure;

The right to be forgotten is not an absolute right and may not be respected in cases provided by law, its exercise is exercised following due certification of your identity.

5.4. Right to restrict processing when:

1. the authenticity of data for the period when their authenticity should be checked is being disputed; or
2. processing of data has no legal ground and instead of erasing it you want to restrict their processing; or
3. data is necessary for establishing, exercising or protecting your legal claims; or
4. objection for processing of data has been submitted pending a check as to whether the grounds of the controller are legal;

in the event of correction, erasure or restriction of processing we will notify each recipient whose personal data has been disclosed unless this is not possible or requires disproportionate efforts.

5.5. Right to transfer of machine-readable data:

When processing your data in an automated manner based on your consent or a contractual ground, you have the right to receive a copy of your data in a structured, widely used and machine-readable format. The data will be provided directly to you or, at your request, it is technically possible to submit it to another controller of your choosing.

5.6. Right to object to processing on the basis of legitimate interest:

You have the right to object to the processing of your data based on the legitimate interests of the controller. ALLTERCO ROBOTICS EOOD will not continue to process your data unless it is proven that there are convincing legal grounds therefor, which prevail over your interests and rights or due to court disputes and other proceedings-related or non-proceedings-related actions.

5.7. Right to object to direct marketing:

You have the right to object to receiving marketing communications, including profiling and analysis of direct marketing.

5.8. Right to a complaint before the Personal Data Protection Commission or before the regulatory body in a Member State of the EU at the place of habitual residence, workplace or place of the alleged violation.

5.9. The right to withdraw the consent granted.

- Consent to direct marketing and advertising – by sending of a notification to the address for cancellation stated in the direct marketing and advertising communication; Upon withdrawal of consent processing of the respective type of personal data for the stated purposes shall be terminated. Withdrawal of consent shall not prejudice the legality of the processing based on the consent granted before its withdrawal.

Unless it is stated otherwise, the above-mentioned rights shall be exercised by way of a written request in a format determined by ALLTERCO ROBOTICS EOOD which may be accessed at the seat of the controller or electronically the following query to the Data Protection Officer at dpo@alterco.com and filling in an electronic form received in response.

A reply to your query shall be sent within a month as of receipt of the written request on our side. In the event when the request presents a factual and/or legal difficulty, as well as in the case of a large number of requests received by the Controller this time limit might be prolonged by two months.

6. Methods used for automated making of individual decisions, including profiling

We do not use automated algorithms and/or profiling.

7. Data Security

We maintain a combination of reasonable and appropriate physical, administrative, and technological controls to protect your data from unauthorized access or malicious actions.

We take reasonable steps to limit the access employees, contractors, and agents have to your data to those who need to know this data to perform their assigned functions.

Regarding any post on or interactions with our Facebook page, including the sharing of links to your Projects, Project Content, and further data available therethrough, like any Facebook page, our page follows the general rules on personal data protection that Facebook provides.

ALLTERCO ROBOTICS reserves the right to change this Privacy Statement to reflect changes in the law, our data handling practices, or the features of our business. The updated Privacy Statement will be available on the <https://shelly.cloud/contest> website. We will show the date the Privacy Statement was last updated to help you know when we change it.