

PRIVACY POLICY - ENVIROFLO APP

Rinnai Australia Pty Ltd (ABN 74 005 138 769) (the **Company**) offers a mobile application to allow you to control, monitor and operate selected Company products (**App**) subject to the products and the mobile or other device being connected to the same WiFi network and are operating within working range. We are committed to protecting your privacy, and want you to be familiar with how we collect, use and disclose information in connection with the App.

This Privacy Policy describes our practices in connection with information that we collect through the App and the embedded software installed in the Company's products, as well as through the services and content provided by the Company in relation to the App and software (collectively, including the App, the **Services**). By providing Personal Information to us or using the Services, you agree to this Privacy Policy.

Personal Information

The Company may collect the following information:

For the purpose of this Privacy Policy, **Personal Information** is information that identifies you as an individual or relates to an identifiable person, including your name, email address, residential address and telephone number.

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy.

The Company may collect Personal Information the following way(s):

The Company and our service providers may collect Personal Information through the Services, such as when you create an account, register your product(s) and or sign up for a newsletter.

The Company may use the Personal Information collected for the following purpose(s):

- (1) To enable you to use the Services and provide you with related customer service;
- (2) To provide you with updates to the App;
- (3) To respond to your inquiries and fulfill your requests, such as to create an account or send you newsletters;
- (4) To provide maintenance support for your product(s);
- (5) To send notices and administrative information to you, such as information regarding the Services and changes to our terms, conditions and policies; and
- (6) For our business purposes, such as data analysis, sales analysis, audits, fraud monitoring and prevention, addressing issues with our Services, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

The Company may disclose Personal Information in the following instances:

- (1) To our parent company, Rinnai Japan, for the purposes described in this Privacy Policy. The Company will remain the party responsible for the management of the jointly-used Personal Information;
- (2) To our third-party service providers who provide services such as app design, development, interoperability and maintenance; data hosting; data analysis; information technology and related infrastructure provision; customer service; email delivery; auditing and other services; and
- (3) To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Other Uses and Disclosures:

The Company may also use and disclose your Personal Information as we believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce our terms and conditions; and (d) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

Other Information

The Company may also collect:

For the purpose of this Privacy Policy **Other Information** is any information that does not reveal your specific identity or does not directly relate to an identifiable individual, such as device information, App usage data, product usage data, IP address, physical location of your product, demographic information and other information provided by you, aggregated information.

If the Company is required to treat Other Information as Personal Information under applicable law, then we may use it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy.

The Company may collect Other Information the following way(s):

We and our third party service providers may collect Other Information in a variety of ways, including:

- (1) **Through your device:** Certain information is collected through your device or software, such as your Media Access Control (MAC) address, screen resolution, operating system name and version, device manufacturer and model, language, software type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly;
- (2) **Through your use of the App:** When you download and use the App, we and our service providers may track and collect usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number;
- (3) **Through your use of your product(s):** When you use the Services, we and our service providers may collect information about your product(s), such as its model and serial number. In addition, we may collect usage data, such as when and for how long

the product is on or off, operating mode, operating conditions and operating parameters;

- (4) **IP Address:** Your IP address is a number that is automatically assigned to the device that you are using by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address;
- (5) **Physical Location:** We may collect the physical location of your product(s) by, for example, using WiFi signals. We may use the information to improve our products and services and provide you with personalized location-based services and content;
- (6) **From you:** Information such as your company name or country of residence is collected when you voluntarily provide it; and
- (7) **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Services (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code).

The Company may disclose Other Information in the following instances:

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Information (such as combining your name with your location). If we do, we will treat the combined information as Personal Information as long as it is combined.

Third Party Services

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by the Company or by our related parties.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organisations, such as Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organisations through or in connection with the Services.

Security

The Company seeks to use reasonable organisational, technical and administrative measures to protect Personal Information within our organisation. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the *Contacting Us* section below.

Choices and Access

Your choices in relation to the disclosure of your Personal Information:

If you would prefer that the Company not share your Personal Information with our related parties in future, you may opt-out of this sharing by contacting us at privacy@rinnai.com.au. We will try to comply with your request as soon as reasonably practicable.

How you can access, change or suppress your Personal Information:

If you would like to review, correct, update, suppress or delete Personal Information that you have provided to the Company, you may do so by editing your user account or by contacting us as set out in this Privacy Policy. In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to impose on the Company's use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Records Retention

The Company may need to retain certain information for record-keeping purposes. There may also be residual information that will remain within our databases and other records, which will not be removed.

The Company will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Use of the Services by Minors

The Services are not directed to individuals under the age of eighteen (18), and we request that they not provide Personal Information through the Services.

Cross-Border Transfer

The Services are controlled and operated by us from Australia and are not intended to subject us to the laws of any other jurisdiction. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, including Japan, and, by using the Services, you consent to the transfer of information to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

Sensitive Information

We ask that you not send the Company, and you not disclose, any sensitive Personal Information (e.g. information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background) on or through the Services or otherwise.

Updates to this Privacy Policy

We may change this Privacy Policy. The “*Last Updated*” at the bottom of this page indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

Contacting Us

If you have any questions about this Privacy Policy, please contact us at privacy@rinnai.com.au or Privacy Officer, Rinnai Australia Pty Ltd, 100 Atlantic Drive, Keysborough, VIC 3173, Australia.

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

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Rinnai Australia Pty Ltd ABN 74 005 138 769