

Data Protection Declaration Phicomm Smart Scale S7

The Phicomm (Shanghai) Co., Ltd. - hereinafter named PHICOMM - takes the protection of your personal data very seriously. We treat all data relating to your person in highest confidentiality and in adherence to the prevailing data protection laws, together with this data protection declaration.

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(1) Introduction

The following information permits you an overview of the way data relating to your person is handled at PHICOMM. The data relating to your person include all information with which your identity can be determined, e.g. your name, email address, street address and telephone numbers.

The Phicomm Health Application - hereinafter called APP - accesses your information. Our APP can contain links to external websites or the services of third parties whose contents and security measures (private sphere) we cannot control or influence. For that reason, we offer no guarantee, assume no responsibility for these websites. Each respective provider or operator is always responsible for the contents and maintenance of security measures in the linked pages. Linked pages at the time these links were established were examined for any possible legal transgressions or infringements. Contents which violated the law were not found at the time of the linking. An ongoing control of linked pages is not possible or reasonable without concrete points of reference to a possible infringement of the laws. In case such suspicions are raised and become known to Phicomm, these links will be immediately removed.

In case you do not agree with the terms of this Data Protection Declaration, the use of APP is unfortunately not possible.

Furthermore, we call your attention to the fact that data transfer in the Internet, for example in email communication, can prove to have security vulnerabilities or flaws. Absolutely sealed, gapless protection of data from being accessed by a third party is not possible. The data protection measures which have been taken are based on the EU guideline 2016/679 of the General Data Protection Regulation (GDPR).

(2) Name and address of the party responsible for the data processing

Responsible Party (in the meaning of the GDPR) is:

Phicomm (Shanghai) Co., Ltd.
No. 3666, Sixian Road, Songjiang District, Shanghai, China
E-Mail: dataprotection@phicomm.com

Power of attorney in the European Union:

Phicomm Europe GmbH
Biberger Straße 93
82008 Unterhaching

Data Protection Officer:

Mr. Martin Klinger
E-Mail: datenschutz@phicomm.com

(3) Data acquisition in establishing a user account

When a user account is established which can be used exclusively for the APP, we ascertain the following data:

- ✓ E-Mail address
- ✓ Personally, selected user name
- ✓ Gender
- ✓ Weight
- ✓ Height
- ✓ Date of birth

Without such a user account, the APP cannot be used.

You can log into the APP via your email or, as an alternative, via your Google+ or Facebook access data. Please pay heed to the data protection stipulations of third parties.

The entry of your personal data is made on a voluntary basis. Without your express permission, the data will not be passed on to a third party.

The processing and utilizing of your data for purposes of counsel, advertisement, or market research will not occur.

Your personal data will be saved and processed in accordance with prevailing legal data protection regulations.

(4) Data acquisition for use of Smart Scale S7 and APP

Please note that APP could necessitate access to the following other applications, in case you wish to use them. We assure you that access is limited to the following areas.

- ✓ Your identity, so that you can receive Push messages.
- ✓ The camera, to enable you to take pictures for your profile photo or link-up via QR code.
- ✓ Memory space for photos, multimedia and other files, so that your pictures can be kept in the cache (profile photos, badges, timeline elements).
- ✓ The telephone, in order to provide a link to your contacts.

During each use of the Smart Scale S7 in connection with the APP, data relating to your persons, e.g. weight, body water percentage or body fat percentage, is measured, recorded and stored.

This personal information is automatically stored in a Cloud of AWS (Amazon Web Service) and is accessible exclusively to the owner of the user account as early as the next use of the APP. Further details about AWS can be found in section (7).

(5) Storage of data

By using the APP, you provide data relating to your person which can be stored by Phicomm. This information is made available to you in real time through use of the App. For use of the APP in Europe, your data is stored exclusively on servers in Germany by AWS. Phicomm Shanghai thereby guarantees that they adhere to the prevailing, valid and applicable data protection laws of the European Union; and that they assume the same responsibility with regard to your personal data as do European countries. A corresponding measure of protection of your data is guaranteed, for example, by technical and organization measures for purposes of informational security which have already been implemented, including entrance and access limitations, and only a small circle of persons being permitted access to your data in case of inquiries.

(6) Persons under age 16

As a consequence of the regulations contained in the General Data Protection Regulation (GDPR), persons under age 16 are not permitted to use the APP.

(7) Data security

PHICOMM has enacted technical and organizational measures in order to provide the most comprehensive security possible to protect against all undesired access to data relating to your person. The data acquired and stored for the use of the APP are kept in servers in Germany. These servers are provided by AWS (Amazon Web Service). All fundamental security measures such as SSL / TLS ciphering, coding and encryption such as firewalls are established

on them. For further details regarding AWS pertaining to data protection, please consult the following URL address: https://aws.amazon.com/de/privacy/?nc1=f_pr

AWS is also a member of the EU-US Privacy Shield Framework (https://www.amazon.com/gp/help/customer/display.html/ref=hp_left_v4_sib?ie=UTF8&nodeId=202135380).

Our employees are thoroughly schooled and trained in the field of data protection. Any potential sub-contracting service providers are selected with care and controlled conscientiously.

(8) Your data protection rights with regard to personal data

Each and every person has the following rights with regard to his/her personal data at PHICOMM (in accordance with the General Data Protection Regulation):

- ✓ The right to object to the use of data at any and all times
- ✓ The right to be provided information on the personal data stored by Phicomm Europe GmbH
- ✓ The right to correct or complete any and all data which has been incorrectly recorded
- ✓ The right to delete all stored personal data (in case of legal obligation to save the data, you have the right to limit its processing)
- ✓ The right to data transferability
- ✓ The right to complain to a governing authority

PHICOMM never utilizes automated decision-making or profiling, in accordance with the General Data Protection Regulation (GDPR).

(9) Contact

If you have any questions with regard to data protection or inquiries about data relating to your person, you can reach us through the following channels:

Telephone:	089 600 5672 0
E-Mail DE:	datenschutz@phicomm.com
E-Mail EN+CN:	dataprotection@phicomm.com
Contact form I	www.phicomm.de

(10) Modification of data protection directives

We call your attention to the fact that these data protection directives / conditions of use can be changed at any time, allowing due consideration to the valid and applicable data protection laws. The prevailing version of the law at the time of your visit is the version which is considered valid.

Current legal version: April 2018