**Privacy Policy (2nd layer)**

**PRIVACY POLICY**

Following the principles of legality, loyalty and transparency, we make this Privacy Policy available to you.

¿Who is the data controller?

The data controller will be the company with which the data subject has contracted the customer service.

LEGRAND GROUP ESPAÑA S.L. with NIF B08272064 and registered office at Hierro 56, 28850 Torrejón de Ardoz (Madrid), will act as data processor, being the owner of the NovoApp management platform, and treating the information in accordance with the privacy policy established below.

Contact email: [DP-SPAIN@neat-group.com](mailto:email@email.com)

What information do we process through the APP?

LEGRAND GROUP ESPAÑA S.L. will only process the data of the telephone number and the data of the terminal associated with the service.

We will also request access to some permissions on your phone, for privacy purposes, which we explain below:

**Geo-positioning🡪** We will use this information to detect abnormal movements of the beneficiary of the terminal and to generate the alarm or contact to ensure that everything is correct.

**Contacts🡪** It is necessary to be able to generate the alarm in case any abnormal or risk situation is detected once the alarm button is pressed.

**Photos / Video🡪** In this case, it is necessary to be able to store some personalization elements of the application, such as the logo of the service provider company.

In addition, the application will start when the terminal is turned on, thus ensuring that it remains active and with full functionality to ensure that the user is protected.

Likewise, the telephone number of those users who download the application without being clients of a service provider may be temporarily processed for the sole purpose of verifying whether it is a user previously notified by the service provider and, if this user has not been notified, the information provided will be removed.

For what purpose do we process your personal data?

At LEGRAND GROUP ESPAÑA S.L. we treat the information you provide us with the sole purpose of managing the service of notices through the app, as well as managing the telephone contact service for the management of notices.

How long will we keep your personal data?

Your data will be kept for the minimum time necessary for the correct provision of each of the services offered to our clients, as well as to meet the responsibilities that may arise from it and any other legal requirement, in accordance with the treatment order contract signed with the service provider companies.

What is the legitimacy for the treatment of your data?

The legal basis for the treatment of your personal data is the execution of a contractual relationship that we maintain with the service provider, as well as with all users who use our App by accepting its privacy policy. The data that we request is adequate, pertinent and strictly necessary and in no case are you obliged to provide it to us, but its non-communication may affect the purpose of the service or the impossibility of providing it.

To which recipients will your data be communicated?

LEGRAND GROUP ESPAÑA S.L. will not transfer your data to any third party, except in the legally established cases, or unless the data subject has expressly authorized it.

Similarly, LEGRAND GROUP ESPAÑA S.L. is the data processor of the service provider company by providing support, service and maintenance of technological systems to the service provider company, the latter being the data controller. For the correct provision of the support and maintenance service 24 hours a day, international data transfers may be made to Chile and Canada so that technicians located in these countries can also provide support and maintenance services. These transfers will have at least one of the guarantees of adequacy indicated in the General Data Protection Regulation 679/2016, establishing a level of protection similar to that of Europe.

What are your rights when you provide us with your data?

The data protection rights of the interested parties are:

* Right to request access to personal data related to the data subject
* Right of rectification or deletion
* Right of opposition
* Right to request the limitation of the treatment
* Right to data portability

The data subjects may exercise their personal data protection rights by directing a written communication to the registered office of LEGRAND GROUP ESPAÑA S.L. or to the e-mail enabled for this purpose, [DP-spain@neat-group.com](mailto:email@email.com), including in both cases a photocopy of ID or other equivalent identification document, as well as before the data Controller.

Models, forms and more information available on your rights on the website of the national control authority, Spanish Data Protection Agency, hereinafter AEPD, [www.agpd.es](http://www.agpd.es).

Can I withdraw consent?

You have the possibility and the right to withdraw consent for any specific purpose granted at the time, without affecting the legality of the treatment based on the consent prior to its withdrawal.

Where can I complain if I consider that my data is not being processed correctly?

If any data subject considers that his data is not processed correctly by LEGRAND GROUP ESPAÑA S.L. he/she can send his/her claims to the email [DP-spain@neat-group.com](mailto:email@email.com) or to the corresponding data protection authority, the AEPD being the one indicated in the Spanish national territory, [www.agpd.es](http://www.agpd.es)

Security and updating of your personal data

In order to safeguard the security of your personal data, we inform you that LEGRAND GROUP ESPAÑA S.L. has adopted all the necessary technical and organizational measures to guarantee the security of the personal data provided. All this to avoid alteration, loss, and / or unauthorized treatment or access, as required by regulations, although absolute security does not exist.

It is important that, in order for us to keep your personal data up-to-date, you inform us whenever there is a change in them.

Confidentiality

## LEGRAND GROUP ESPAÑA S.L. informs you that your data will be treated with the utmost zeal and confidentiality by all the personnel involved in any of the treatment phases.