

# EcoStruxure Transformer Expert Essential Privacy Notice

## 1. What is the scope of this privacy notice?

This privacy notice applies to EcoStruxure Transformer Expert Essential (“the service”). The statements here, together with those in our Data Privacy Policy explain what personal information will be collected through your use of the service, how the information will be used and how you can control the collection, correction and/or deletion of information.

## 2. Who is in charge of data processing?

The processing of personal information is carried out by Schneider Electric Industries SAS (“we”) as data controller. As a global company, we commit to ensure an adequate level of protection for personal information in compliance with applicable laws. We have adopted internal policies which impose common rules for the collection, use and disclosure of personal information by all entities globally. To know more, please, read our [Data Privacy Policy](#).

## 3. What types of personal information do we process?

- Contact information
- Professional information (company name, company address, work phone number, work email address)
- Identification information, such as name, country, username
- Technical information (information about devices you use, such as their identifiers, model and version)
- Technical information about the devices you set up the system to monitor (device log, device IP address, device name, device type)
- IoT and sensor data, such as device statuses, energy production or use, and other variables, device identifiers, as well as event logs
- Inferred and derived information, such as health indices, notifications, alerts
- Like any system, connections are logged for security purposes.

In cases where your account is managed by someone else (such as an administrator or employer), they may provide data on your behalf.

We may collect and use other types of personal information as described in our Data Privacy Policy. Depending on the circumstances, these activities may be based on the execution of a contract with you, on our legitimate interest, on the legitimate interest of a third party, or for compliance with a legal obligation.

We do not make decisions based solely on automated processing which may produce legal effects or similarly affect you.

#### 4. Why do we collect and use personal information?

We use personal information to provide users with access to their account and enable the application, authenticate them and verify their identity, to interact with users (e.g. send alerts, notifications and other communications, including about the use, security and privacy of the application), to ensure the security of the application and the compliance with its terms of use and to analyze the use of the application to improve it. This is based on our legitimate interest in operating the platform and providing services to our customers. We use location, with your permission, to be able to show “on site location” status. This is based on your consent. A full presentation of the purposes for which we use personal information is found in our Data Privacy Policy.

We do not make decisions based solely on automated processing which may produce legal effects or similarly affect you.

#### 5. How long do we keep your personal information?

We keep information as needed to perform the purposes described above, taking into consideration the need to provide the services, marketing requirements, security requirements, legal requirements, and statute of limitations.

Location information is not kept but only displayed in real time if used.

For marketing purposes, we keep relevant customer information for three years after the end of our relationship or since the last interaction with us.

Some devices have a specific retention period:

- Information read or measured by sensors is kept during all subscription period
- Ultimate deletion of your information may be temporarily delayed to give you an opportunity to undo a mistake, to comply with legal requirements and statute of limitations.

#### 6. Who do we share personal information with and where is it Processed?

Personal information will be processed by our affiliates and suppliers involved in the provision of the services and in the performance of the purposes described in Section 3. We take measures to ensure that personal information receives an adequate level of protection. We do not sell your personal information.

Our affiliates and suppliers provide services including hosting and maintenance, performance monitoring and security. As we are a global company, teams and suppliers may have global or

multi-country roles, and they can be located anywhere in the world, in countries with different privacy standards than the country of our customers.

We have internal policies applied by our affiliates and we conclude contracts with our suppliers to ensure appropriate safeguards. Our group has adopted Binding Corporate Rules (BCR). In addition, we conclude Standard Contractual Clauses and rely on EU Commission's adequacy decisions. To obtain more details and copies of safeguards put into place, you may contact [global-data-privacy@schneider-electric.com](mailto:global-data-privacy@schneider-electric.com).

We may also share your information, as necessary:

- with competent authorities, based on a good faith belief that disclosure is necessary to respond to a judicial process, a valid official inquiry, or if otherwise required by law;
- to defend our legal rights, or to protect the rights or safety of any person or entity;
- as instructed by you, our customer or the user.
- with third parties in the context of reorganization of operations.

If you authorize third parties to collect information from connected devices to access information processed within the service, or to issue commands to connected devices (for instance using a third-party voice assistant), we will also share information with these third parties in order to perform your requests. We do not control these third parties or their privacy practices. You should review their privacy policies before engaging with them.

## 7. How do we secure personal information?

We follow generally accepted industry standards to protect personal information and we maintain appropriate administrative, technical and physical safeguards to protect it against accidental or unlawful destruction, accidental loss and unauthorized alteration.

However, no method of transmission over the internet or of electronic storage is 100% secure. Therefore, we cannot guarantee absolute security.

## 8. How to exercise your choices and rights about your personal Information?

To exercise the data protection rights granted under applicable data protection law, such as the rights to be informed, to access, to rectify, to withdraw consent, to request restriction or erasure, the right to object and data portability, you may:

- access and edit your personal information and your choices, using the "Profile settings" tab
  - make a request at the contact details available within the application or at [support@dts.com](mailto:support@dts.com).
- To ensure the security of your personal information, we may ask you to provide other details to verify your identity.

Additional information and advice to protect your information are available in the [FAQ](#)  
For any suggestion, question and request, you may contact us and we will be happy to help you.  
You may address questions or comments about our privacy practices or this privacy notice to  
our Group Data Protection Officer (Group DPO):

*DPO@schneider-electric.com*  
*DPO Schneider Electric*  
*35 rue Joseph Monier CS 30323*  
*92506 Rueil Malmaison*  
*France*

If you believe that we have processed your personal information in violation of applicable law,  
you may file a complaint with the Group DPO at the contact details above or with a supervisory  
authority.

This privacy notice may change from time to time. We will provide information about material  
changes.