

SiteWorx Facility Insights Application Suite

Data Policy as of July 1, 2022

When you entrust your data to Digital Lumens, Inc. (DLI) through SiteWorx®, DLI safeguards that data and honors the permissions you set for sharing it with others.

The intent of this policy is to be transparent about how DLI collects and manages your data, and to provide our customers with key information that will allow you to make informed decisions about your data within SiteWorx.

The terms of your services subscription are provided in the SiteWorx Software as a Service Terms and Conditions. Use of personal information is governed by the SiteWorx Privacy Policy.

This statement explains:

- The types of data we may collect from you.
- Your responsibilities for managing your data, for sharing permissions, and your options if you do not want DLI to use or disclose your data.
- How we may use or disclose that data.
- Our responsibilities for protecting and maintaining your data.

What Types of Data Do We Collect?

We collect and curate five kinds of Data through the SiteWorx platform: Customer Data, Operational Data, Device Data, Administrative Data, and Aggregated Data.

Customer Data is data you provide about your facility.	For Example: - Building Location - Fixture (Luminaire) Mapping	You provide Customer Data to enable installation and commissioning of SiteWorx. This may be reflected in reports and the user interface.
Operational Data is information about the work you do with your equipment and the area where the work occurs.	For Example: - Areas active - Occupancy data - Space utilization - Lighting ON/OFF	You can see and manage your SiteWorx Operational Data via the internet, mobile devices, apps, tablet, etc.
Device Data is information that indicates machine health, efficiency, and function.	For Example: - Light and sensor health indicators, settings, and readings - Fixture Location - Diagnostic Codes - Software and Firmware versions	You can see some Device Data in SiteWorx; however, certain Device Data may not be shown if it is considered proprietary to DLI.
Administrative Data is information that helps DLI support your account and activities in our systems.	For Example: - User Permissions - Users linked to your account - Devices associated with your account.	You can see and manage Administrative Data in SiteWorx. SiteWorx may enable you to store and share information you or others create.
Aggregated Data is compiled from Operational Information of multiple installations and collected in an aggregated and anonymous manner.	For Example: - Energy savings by category of building.	For DLI use only.



Who Sees Your Data?

You control who sees your data. The following options are available to you for controlling your account information when you use SiteWorx:

- **Sharing** — You may share and disclose data in SiteWorx and other connected portals and apps. By setting permissions for your account, you control other parties' access and visibility into your data.
- **Managing** — You may view, analyze, and manage Operational Data, Aggregated Data, some Device Data, and certain Administrative Data in your account via SiteWorx portal.
- **Exporting** — You may download and export Operational Data reports with your SiteWorx administrative account.

How We May Use Your Data

To provide services and support

- We use your data to provide you with contracted services and offerings and to administer your account.
- We may share your data with DLI affiliates and suppliers to provide you with contracted services and offerings and to administer your account. Our affiliates and suppliers have committed to protect your data consistent with this statement and all applicable privacy and other laws.

To learn from you

- We may use your data to develop and improve our products and services. For example, analyzing your data may spotlight trends that inform our product support, warranty services, and diagnostic or prognostic activities.
- We may aggregate your data with data from others and include your data in anonymized data sets (Aggregated Data). These anonymized data sets are proprietary to DLI and are not traceable back to you or your specific operations.

To comply with the law

- We share your data as required by applicable laws, and our SiteWorx Software as a Service Terms and Conditions.
- We may review and disclose your data to comply with court orders and legal or regulatory requirements; to prevent injury, death, losses, fraud or abuse; to protect DLI's rights or to defend itself in legal proceedings; and to comply with requests from you.



How We Safeguard and Maintain Your Data

We have implemented and continue to maintain standards and procedures designed to prevent misuse of information in your account:

- We maintain physical computer and network security.
- We maintain security standards and procedures to help prevent unauthorized access to information about you, and we update and test our technology to protect your information.
- Site configuration and user interaction data is available only to DLI support and engineering teams. This data provides DLI with basic user metrics to assist in analysis and product improvement. Control applications and data are stored on a secure Amazon Web Services cloud server. Access to this data is secured by TLS/SSL protocol.
- Customer Data and configurations are regularly backed up.

DLI takes your data security very seriously and has agents constantly monitoring all our cloud assets to ensure there is no unusual activity or known vulnerabilities. Upon discovery of any unusual or malicious behavior, we will take the appropriate actions to address or resolve any threats to our application or infrastructure security.

If DLI becomes aware of any compromised Data related to you, DLI's Security Officer will provide notification via email to the assigned SiteWorx Organization Administrator with details of compromised data and our plan to resolve the vulnerabilities, if not already resolved.

Storing and Processing

We store and process Data on AWS (Amazon Web Services) data centers in the US and Germany. DLI may move Data across jurisdictions and may store or process your information in the United States or the EU.

Deleting, Updating, and Amending

You may request that we delete, update, or amend Data in your account, and we will honor your request to the extent it is possible to do so within 30 days. Please note that deleting data may limit our ability to support you and, in some cases, may constitute a termination of your SiteWorx Software as a Service Terms and Conditions.

DLI may retain certain basic Data for our record keeping purposes. Please review the terms of your agreement and service order for details.

- Upon subscription termination, we may delete data as provided in the SiteWorx Software as a Service Terms and Conditions, subject to record retention policies or legal requirements.
- To request deletion, updates, or amendment of Data send request by email to: siteworxops@digitallumens.com.