

# Privacy Statement for DROP Connect™ Products and Services

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Policy active as of February 7, 2018

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This Privacy Statement for DROP Products and Services (“Privacy Statement”) describes information that Chandler Systems, Inc. and its subsidiaries and affiliates (collectively, “DROP”) collect, use, share, and store, including personal information (i.e., information that personally identifies you, such as your name, email address or billing information, or other data that can be reasonably used to infer this information).

This document focuses on information related to the operation of DROP products and services, including the DROP Water Softeners, DROP Leak Detectors, DROP Backwashing Filters, DROP Cartridge Filters, and other products from DROP (collectively, “DROP Products”). In this Privacy Statement, the expression “DROP Products” also includes our Mobile App.

Our Promise:

1. We will be transparent about the different types of information we collect and how we use them.
2. We will ask your permission before sharing your personal information with third parties for purposes other than at your request.
3. We will use best-in-class data security tools to keep your data safe and protect the DROP Products from unauthorized access.

Your Consent:

Consent to data collection and processing. By using DROP Products, you agree to allow us to collect and process information as described in this Privacy Statement.

## **What information does the DROP Hub collect?**

The DROP Hub collects:

- Setup information you provide
- Environmental data from the DROP Leak Detectors
- Direct adjustments to the devices, notifications, or settings
- Water usage information

- Technical information from the device

Setup information you provide: When you install the DROP hub, you'll be asked several questions in order to help us create an initial program. For example, we'll ask for information like your email address and phone number, or your home address or postal/ZIP code. This information helps us to customize your experience by, for example, by sending you notifications when there is a problem with your system or a leak somewhere in the home.

Environmental data from the DROP Products: We collect data from several sensors built into DROP products. These sensors collect data such as current temperature & water flow rates. They can also sense whether water is detected in areas where it shouldn't be or whether water is running continuously. This helps your DROP products protect your home and conserve water whether you are home or away. For example, if a DROP Leak Detector senses that there is water behind your washing machine it can automatically shut off the water to your home, based on an assumption that there is a plumbing leak.

Direct adjustments to the device: If you change settings like bypassing treatment on the DROP Water Softener, it records and feeds that information to the DROP Hub.

Water Usage information: Every time you use water, DROP records the time and how much water was used in order to offer you features such as water use history.

Technical information from the device: In order to improve your experience over time and help troubleshoot any problem you may encounter with DROP products, we record your DROP product model and serial number, software version, and technical information such as battery charge level.

### **What information is shared among multiple connected DROP Products?**

If you have multiple DROP Products interfacing with one another, the products will share certain information with each other, such as data on water usage, temperature data, and the occurrence of a water leak. This sharing may occur locally among connected devices. Sharing can also occur between DROP Products and your mobile device or application, or among DROP's servers. Understanding the temperature in different rooms of your home can help the products do things like take preventative action to shut off your water if you are approaching a freezing temperature and protect your home from water damage. You may also turn off the water when you leave the home or disable other features like softening or filtering your water.

### **What additional information does DROP collect and store when a user connects a DROP Product to the Internet or creates an account?**

Wi-Fi Network Information: To connect your DROP Product to our Services, or to access your DROP Product over the Internet from a computer, a smartphone or a tablet, you will need to connect it to your Wi-Fi network. During setup, the DROP Product will ask for your Wi-Fi network name (SSID) and password to connect to the Internet. It will save this information on the device, along with your IP address, so

that you can access it and control it from your computer, smartphone or tablet, and so that it can communicate with DROP servers and download software updates. Once connected to your Wi-Fi network, your DROP Products regularly sends the data described in this Privacy Statement (excluding your Wi-Fi password) to DROP to provide you with the Services.

*Additional Authorized Users:* DROP may provide you with the ability to enable additional authorized users to access your account. If you do so, the additional authorized users may control and view all of your devices, content, and settings. Invited users may also add additional authorized users to your account, so be careful to add only those you trust. An invited user must have or create a DROP account, and information about invited users (like email address, name, or changes to product settings) will be stored with your account.

*Email Addresses:* When you create a DROP account, we collect and store your email address. From that point forward, your email address is used for communications from DROP. In addition, DROP may provide you with the ability to enable individuals to access your account as additional authorized users, or to invite other individuals such as friends or family to share access to your content such as water use history. We will ask you for the email address of any such individuals and automatically send an email invitation on your behalf. DROP stores this information to send this email, to register your friend if your invitation is accepted, and to track the success of our invitation services.

*Basic Profile Information:* Your account allows you to provide certain basic profile information like your name and address. Names and addresses may be shown to others in connection with the Services. For example, if you invite someone as an additional authorized user, he or she will be able to see your name and address. You should only use information you are willing to make public.

### **How does DROP use the information it collects?**

We use this information to provide, develop and improve DROP Products and services, including to make assessments and recommendations about products, safety, or water use. We may use your contact details to send you this information, or to ask you to participate in surveys about your DROP use, and to send you other communications from DROP.

We may also use this information in an aggregated, non-identified form for research purposes and to help us make sales, marketing, and business decisions. For example, we use aggregated user information about the number of active DROP users in a particular state to help us decide what companies might be good partners, and aggregated water leak data to study detection rates across our customers.

We may use service providers to perform some of these functions. Those service providers are restricted from sharing your information for any other purpose.

We use industry-standard methods to keep this information safe and secure while it is transmitted over your home network and through the Internet to our servers. Depending on your location and type of data, DROP may process your personal information on servers that are not in your home country.

### **In what circumstances does DROP share my information?**

Under no circumstance do we share personal information for any commercial or marketing purpose unrelated to the activation and delivery of DROP Products and services without asking you first. Period. We do not rent or sell our customer lists.

The following are the limited situations where we may share personal information:

- **With your consent:** We may share personal information when we have your consent. One example of this would be if you invite another user to access the Products on your account as an additional authorized user. Another example is if you sign up for programs offered by our partners (e.g., insurance companies); if you do this, we may share certain information with the partner. This could include things like your enrollment information and the activation status of your device.
- **For external processing:** We have vendors, service providers, and technicians who help with some of our processing and storage, including helping to answer your questions. They may also assist with monitoring our servers for technical problems. These technicians (as well as DROP employees) can access certain information about you or your account in line with this work but these technicians are not allowed to use this data for non-DROP purposes.
- **As part of business transitions:** Upon the sale or transfer of the company and/or all or part of its assets, your personal information may be among the items sold or transferred. We will request a purchaser to treat our data under the privacy statement in place at the time of its collection.
- **For legal reasons:** We may provide information to a third party if we believe in good faith that we are required to do so for legal reasons. For example, we may disclose information in response to legal process and we may disclose information in response to lawful requests by public authorities in the United States and other countries for the purposes of law enforcement and national security.

We may share non-personal information (for example, aggregated or anonymized customer data) publicly and with our partners. For example, we may publish trends about water use in the home. This information may also be shared with other users to help them better understand their water usage compared to others in the DROP community, raise awareness about home protections issues, or help us generally improve our system. We may also share non-personal information with our partners, for example, if they are interested in providing demand-response services or other

incentive programs. We take steps to keep this non-personal information from being associated with you and we require our partners to do the same.

If you select an outside party for the purchase, installation, or service of your DROP device and share your personal information, we cannot control the collection, storage or sharing of information collected by that party. For example, if you buy a DROP Water Softener from a retailer, the retailer may collect personal information as part of the transaction. Or the party that installed the device may retain information that you provided to them to assist them in servicing the device if needed. Always check the privacy policies for any company that collects your personal information.

### **How can I delete my personal information?**

DROP generally stores your personal information on DROP's servers until you edit it, or for as long as you remain a DROP customer in order to provide you with DROP Products.

As described above, some information is processed and stored directly on the DROP devices. All personal information is encrypted as it is transmitted to DROP and cannot easily be accessed.

You can delete the information on the DROP device by deleting your account and then resetting the hub to the defaults (using the Factory Reset procedure described in the user manual).

Because of the way we maintain certain Services, after your information is deleted, backup copies may linger for some time before they are deleted, and we may retain certain data for a longer period of time if we are required to do so for legal reasons.

### **Can the Privacy Statement be changed?**

Please note that this Privacy Statement may change from time to time. We will provide notice of any changes on the website or by contacting you.

### **How can I contact DROP?**

Chandler Systems, Inc. 710 Orange St., Ashland OH 44805

If you have any questions, please contact us at [admin@DROPconnect.com](mailto:admin@DROPconnect.com).