

Privacy Policy

Updated: March 21, 2023

Effective: March 22, 2023

Estudio Technologies Pte Ltd. and its Affiliates (as hereinafter defined) (“we”, “us”, “our”, or “Estudio”) are committed to protecting your privacy. Boulevard 88 Privacy Policy (this “Policy”) describes our practices in connection with information privacy on Personal Data (as hereinafter defined) we process through your use of our products and services (collectively, the “Services”), for instance the Boulevard 88 Mobile Application (the “App”).

Before you start using the Services, please carefully read this Policy which details our purposes for collecting and processing your Personal Data, as well as how we use, store, share and transfer your Personal Data. In this Policy you will also find ways to exercise your rights of access, update, delete or protect your Personal Data.

If you have any question regarding this Policy, please do not hesitate to contact us via:

Email: Project@estudiotech.sg

Tel : +65 6251 2312

You are not obliged to provide to us your Personal Data (as defined below). However, we may be unable to provide you with certain products and/or Services if you decline to provide such data.

Definitions

In this Policy:

Affiliate means any company, firm or legal entity that: (1) is directly or indirectly controlled by **Estudio**; or (2) directly or indirectly controls **Estudio**; or (3) jointly with **Estudio**, controls the same company; or (4) is, directly or indirectly, under common control of the same company with **Estudio**. Affiliates shall include, without limitation, subsidiaries, and such subsidiaries under common control of the same parent company as **Estudio**.

Personal Data means information generated, collected, recorded and/or stored, electronically or otherwise, that can be used to identify an individual or reflect the activity of an individual, either from that information alone, or from that information and other information we have access to about that individual.

Personal Sensitive Data includes personal biometric information, communication records and contents, health information, transaction information, and precise location information, etc. according to various data protection laws and regulations. When we collect Personal Sensitive Data from you, we will generate an explicit notification for your consent before we collection personal sensitive data about you.

Smart Devices refers to those computing devices produced or manufactured by hardware manufacturers, with human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, smart intercom devices, etc.

1. What Personal Data Do We Collect?

In order to provide the Services to you, we will ask you to provide necessary Personal Data that is required to provide those Services. If you do not provide your Personal Data, we may not be able to provide you with the Services.

1) Information You Voluntarily Provide to Us

- **Registered Account Data:** When you register an account with us, we may collect your account name and contact details, such as your email address, phone number, user name, and login credentials. During your interaction with the Services, we may further collect your nickname, country code, language preference or time zone information into your account.

If you authorize login to the Services with a third-party account, we will obtain from such third party your account information (such as portrait, nickname, region etc.) which may be bound with your Boulevard 88 account for quick login. We will ensure compliance with applicable data protection laws and regulations, as well as agreements, policies or documentations agreed with such third party regarding sharing personal information, in processing your Personal Data.

Information based on additional functions:

In order to offer you with more convenient and higher-quality Services with optimized user experiences, we may collect and use certain information if you consent to use additional functions in the App. Please note, if you do not provide such information, you may continue to use basic Services of the App and connected Smart Devices, but certain features based on these additional functions may not be available. These additional functions may include:

Additional functions based on location information:

When you enable the location-based functions through permission settings on your mobile device, we will collect and process your location information to enable these functions, such as pairing with your Smart Devices. Also, we may collect information about your a) real-time and precise location, for instance when you choose to use the automation scenarios for controlling your Smart Device, or b) non-precise geo-location when you use certain Smart Devices or the Services, such as weather service.

Based on your consent, when you enable the location service, your location information will be generated and shared with Google Maps services. Please note that Google has corresponding data protection measures, which you may refer to Google Data Protection Terms for more details. You may disable the collection and use of

your location information by managing the device level settings, upon which we will cease to collect and use your location information.

Additional services based on camera:

You may use the camera to scan the code by turning on the camera permission to pair with a Smart Device, take video, etc. Please be aware that even if you have agreed to enable the camera permission, we will only obtain information when you actively use the camera for scanning codes, video recording, etc.

Additional services for accessing and uploading pictures/videos based on photo albums (picture library/video library):

You can use this function to upload your photos/pictures after turning on the photo album permission, so as to realize functions such as changing the profile photo, etc.. When you use the photos and other functions, we will not recognize this information;

Additional services related to microphone-based service:

You can use the microphone to using intercom voice communication after turning on the microphone permission, such as communication with visitor via visitor call panel etc. For these functions, we will collect your voice information to recognize your command. Please be aware that even if you have agreed to enable the microphone permission, we will only obtain voice information through the microphone when you voluntarily activate the microphone in the App.

Additional services based on Notification permission:

The reason why we ask you the permission is to send you notifications about using our application services e.g., Incoming call from visitor call panel, Facility booking announcement, etc.

Additional services based on Bluetooth permission:

You can enable Bluetooth functions after turning on the permission, including control the Smart Device, acquiring device status, device discovery, and device network configuration. In these functions, we will communicate with terminal devices via Bluetooth. Please be aware that even if you have agreed to enable the Bluetooth permission, we will only use Bluetooth for communication in these scenarios: display the device status on the home page and Smart device panel; perform device control on the home page and device panel; we would use it on the home page and the add device page for discovering equipment, equipment distribution network.

Please note that if you turn on any permission, you authorize us to collect and use relevant personal information to provide you with corresponding Services. Once you turn off any permission, we will take it as a cancellation of the authorization, and we will no longer continue to collect Personal Data based on the corresponding permissions, and the related functions may be terminated. However, your decision to turn off the permission will not affect previous collection and use of information based on your authorization.

Information We Collect Automatically

- **Mobile Device Information:** When you interact with our Services, in order to provide and maintain the common operation of our Services, improve and optimize our Service, and protect your account security as well, we automatically collect mobile device information, such as mobile device model number, IP address, wireless connection information, the type and version of the operating system, application version number, push notification identifier, log files, and mobile network information. Meanwhile, we will collect your software version number. In order to ensure the security of the operating environment or to provide services, we will collect information about the installed mobile applications and other software you use.
- **Usage Data:** During your interaction with our websites and Services, we automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our websites and Services.
- **Log Information:** When you use the App, in order to improve your user experience, the system and exception log may be uploaded, including your IP address, preference language setting, operating system version, date or time of access, so that we can facilitate and accurately identify problems and help you solve them in timely manner.

Please note that one cannot identify a specific individual by using device information or log information alone. However, if these types of non-personal information, combined with other information, may be used to identify a specific individual, such information will be treated as Personal Data. Unless we have obtained your consent or unless otherwise provided by data protection laws and regulations, we will aggregate or desensitize such information.

3) Smart Devices Related Information:

When you use a Smart device, we will collect some basic and pre-embedded information of the Smart Device and the information generated during your use of the Smart Device.

- **Basic Information of Smart Devices:** When you connect your Smart Devices with the Services, we may collect basic information about your Smart Devices such as device name, device ID, online status, activation time, firmware version, and upgrade information.

- **Information collected during the process of connecting to a Smart Device:** Based on the type of Smart Device you need to connect, whether the Smart Device is connected via Wi-Fi, via Wi-Fi after establishing a local connection via Bluetooth, via Bluetooth or via Zig-bee, we will collect the Mac address of the smart device.
- **Information Reported by Smart Devices:** Depending on the different Smart Devices you elect to connect with the Services, we may collect different information reported by your Smart Devices. The following information reported by the Smart Device only applies when you use them.

2. Purposes and Legal Basis for Processing Personal Data

The purpose for which we may process information about you are as follows:

- **Provide You Services:** We process your account data, mobile device information, usage data, location information, and Smart Device related information to provide you with the Services and Services that you have requested. The legal basis for this processing is to perform our contract with you according to our [User Agreement](#).
- **Improve Our Services:** We process your mobile device information, usage data, location information and Smart Device related information to ensure the functions and safety of the Services, to develop and improve the Services, to analyze the efficiency of our operations and to prevent and trace fraudulent or inappropriate usage. The legal basis for this processing is to perform our contract with you according to our User Agreement.
- **Data Analysis:** In order to analyze the usage of the products we provide and improve your user experience, we will analyze the data you provide us, a) we need to check your problems when you encounter any malfunctions during the usage of the product, under such circumstance, you may not able to opt-out because it is highly relate to your functionalities and quality of using our product and service, and b) analyze data about how you interface with the product or under particular scenarios so that you can better enjoy the convenience brought by our Services.

Marketing Communication and Personalization: We may process your account data, usage data, device information to personalize product design and to provide you with services tailored for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of the Services. If you do not allow us to process your Personal Data for personalization.

- **Legal Compliance.** We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:
 - a) comply with a legal obligation, process or request;
 - b) enforce our User Agreement and other agreements, policies, and standards, including investigation of any potential violation thereof;

c) protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law; or

d) detect, prevent or otherwise address security, fraud or technical issues.

If there is any change in the purposes for processing your Personal Data, we will inform such change to you with a prominent notice on our website of such changes of purposes, and choices you may have regarding your Personal Data.

3. Who do We Share Personal Data with?

At Estudio, we only share Personal Data in ways that we tell you about. Without your consent, we will not disclose your Personal Data to third-party companies, organizations, or individuals except in the following cases:

- To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.
- To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices, and/or networks and systems through which you access and use our websites and Services.
- To subsidiaries or affiliates within our corporate family for purpose of regular business activities based on our instructions and in compliance with applicable law, this Privacy Policy and other appropriate confidentiality and security measures.
- To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, and choices you may have regarding your Personal Data.
- As we believe in good faith that access to, or use, preservation, or disclosure of the information is reasonably necessary or appropriate to:

(a) Comply with applicable law, regulation, legal process, or lawful governmental request;

(b) Enforce our Terms of Use and other agreements, policies, and standards, including investigation of any potential violation thereof;

(c) Protect our operation and business systems;

(d) Protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law;

(e) Perform risk management, screening and checks for unlawful, fraudulent, deceptive or malicious activities.

Except for the third parties mentioned above, we only disclose your Personal Data to other third parties with your consent.

Data Transfer

Estudio operates globally, and Personal Data may be transferred, stored and processed outside of the country or region where it was initially collected. Also, the applicable laws in the countries and regions where we operate may differ from the laws applicable to your country of residence. Under the Personal Data protection framework and in order to facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live.

We protect Personal Data in accordance with this Privacy Policy wherever it is processed and take appropriate contractual or other steps to protect it under applicable laws.

The European Commission has determined that certain countries outside of the European Economic Area (EEA), the UK or Switzerland can provide adequate protection of Personal Data. Where Personal Data of users in the EEA, Switzerland, or the UK is being transferred to a recipient located in a country outside the EEA, Switzerland, or the UK which has not been recognized as having an adequate level of data protection, we ensure that the transfer is governed by the European Commission's standard contractual clauses. You can review the agreement on the basis of approved EU standard contractual clauses per GDPR Art. 46.

If you would like further details on the safeguards we have in place under the data transfer, you can contact us directly as described in this Privacy Policy.

Data Subject Rights

We respect your rights and control over your Personal Data.

Response Fee&Timeframe: You do not have to pay any fee for executing your personal rights. Subject to applicable data protection laws in relevant jurisdictions, your request of privacy rights will be fulfilled within 15 business days, or within 30 calendar days due to different response requirement.

If you decide to email us, in your request, please make clear what information you would like to have changed, whether you would like to have your Personal Data deleted from our database or otherwise let us know what limitations you would like to

put on our use of your Personal Data. **Please note** that we may ask you to verify your identity before taking further action on your request, for security purposes.

1) For privacy permissions acquired through device system settings, your consent can be withdrawn by changing device permissions, including location, camera, photo album (picture library/video library), microphone, Bluetooth settings, notification settings and other related functions;

2) Unbind the Smart Device through the App, and the information related to the Smart Device will not be collected;

When you withdraw your consent we may not be able to continue to provide you with certain products or services correspondingly. However, your withdrawal of your consent will not affect the processing of personal information based on your consent before the withdrawal.

If you have more questions please do not hesitate to contact Project@estudiotech.sg to elaborate your privacy rights.

Security Measures

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data. We provides various security strategies to effectively ensure data security of user and device.

- As for device access, Estudio proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization.
- As for data communication, communication using security algorithms and transmission encryption protocols and commercial level information encryption transmission based on dynamic keys are supported.
- As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you could immediately notify us of the problem by emailing Project@estudiotech.sg

Data Retention

We process your Personal Data for the minimum period necessary for the purposes set out in this Policy, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period based on the amount, nature, and sensitivity of your Personal Data, and after the retention period ends, we will destruct your Personal Data.

- Personal Data will no longer be retained when you request to remove your Personal Data, we will accordingly complete the task.

When we are unable to do so for technical reasons, we will ensure that appropriate measures are put in place to prevent any further such use of your Personal Data.

Changes to this Policy

We may update this Policy to reflect changes to our information practices, at least on an annual basis. If we make any material changes we will notify you by email (send to the e-mail address specified in your account) or by means of a notice in the mobile applications prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about our practices or this Policy, please contact us as follows:

TEL: +65 6251 2312

EMAIL: PROJECT@ESTUDIOTECH.SG

OPENING HOURS

Monday: 9:00 – 18:00

Tuesday: 9:00 – 18:00

Wednesday: 9:00 – 18:00

Thursday: 9:00 – 18:00

Friday: 9:00 – 18:00

Saturday & Sunday: Closed