

Effective Date: August 23, 2019

PRIVACY STATEMENT/YOUR PRIVACY RIGHTS – Light ARchitect™ MOBILE APPLICATION

If you are in the European Economic Area (“EEA”), please click [here](#) for more information about your specific privacy rights.

Eaton Corporation (“Eaton,” “us,” “we,” or “our”) owns and operates the Light ARchitect™ mobile application and websites associated (“Mobile Application”) and the augmented reality-based services provided through or while using the Mobile Application (collectively, the “Services”). Eaton, as the data controller, is committed to protecting the privacy of those who access the Mobile Application and use the Services. This Privacy Statement (“Statement”) contains details about how Eaton collects, uses, and shares with third parties Personal Data (defined below) that we obtain from and about you when interacting with Eaton and the Services. Please read this Statement carefully. If you not agree with our policies and practices, do not download, install or operate the Services, do not access or use the Mobile Application, and do not interact with any other part of the Services.

Applicability: This Statement covers only the Services identified above and does not apply to information that you may send us by other means or related to other Eaton products or services. Other Eaton sites, applications and online services or locations may have their own privacy statements, and you should consult those accordingly. This Statement also does not apply to job applicants or Eaton employees.

Whenever you interact with Eaton or the Services on behalf of another individual or entity, such as by providing or accessing Personal Data about another individual, you represent that you have the authority to do so. You shall have sole responsibility for any violation of privacy laws as a result of a failure to obtain any necessary consent from such individual/entity.

Changes: Eaton may update this Statement from time to time. The current Statement will be posted at the bottom of the home screen for the Services and will be effective when updated. Please check this Statement periodically for updates. If any of the changes are unacceptable to you, you should cease using the Services. When required, we will notify you of any changes to this Statement. If any changes to this Statement materially affect how Eaton treats or handles Personal Data that you have already provided to Eaton or that has otherwise been collected by us, or when required under applicable laws, we will seek affirmative consent from you, by email (if we have a valid email address to use), to use it in the new manner. If you do not provide such consent, Personal Data will continue to be used in a manner that is consistent with the version of this Statement under which it was collected, or the information will be deleted.

What Information Do We Collect?

Personal Data (“Personal Data”) is any information relating to an identified or identifiable natural person (“Data Subject”).

Sources of Personal Data:

We collect information about you and how you use the Services in several ways, including:

- **Information you provide to us directly.** We collect the information you provide to us directly, such as when registering on or accessing the Mobile Application, signing up for offers, or communicating with us.
- **Information collected or inferred from your use of the Services.** We collect information about the Services and how you use them, such as information collected automatically when you visit or use our Mobile Application, download a mobile application, or otherwise interact with the Services.
- **Information from third parties.** We receive information about you and your use of the Services from third parties, such as third party service and content providers, companies that provide or sell lists of potential purchasers, and other Services users.

We may combine information that we receive from the various sources described in this Privacy Statement, including third party sources, with Personal Data and use or disclose it for the purposes identified below.

Information We Collect:

The types of information that Eaton collects about you include:

- **Contact and account information**, such as your name, postal address, email address, phone number, user name and password
- **Financial information**, such as your credit/debit card number or bank account number (if any product or service purchase capability is incorporated into the Mobile Application)
- **Demographic information**, such as your age, race, gender, education, or date of birth
- **Technical information gathered when you interact with the Services**, such as IP address, browser information, ICCID, device type, app and OS version
- **Internet or other electronic network activity information**, such as your browsing history, search history, and information regarding your interactions with and use of the Services (including the Mobile Application, and advertisements)
- **Employment information**, such as job title, employment history, or other professional information
- **Commercial information and preferences**, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
- **Geolocation data**
- **Audio, electronic, visual, thermal, olfactory, or similar information**, such as pictures
- **Inferences** drawn from any of the information we collect to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

How Do We Use Your Personal Data?

We may use your information in a number of ways, including:

- **To provide you with the Services**, such as to register and administer your account, provide Services you may request; support your Services; diagnose, repair and track service and quality issues; communicate with you about your Services; install and configure changes and updates to your Services; authenticate users of our Services; verify your eligibility for certain programs or benefits; or to respond to your requests, complaints, and inquiries.

- **For our own internal business purposes**, such as to evaluate or audit the usage, performance and safety of our Services; evaluate and improve the quality of our Services and design new services; operate the Site and customize the content; internal research purposes; display or evaluate the effectiveness of our advertising or marketing efforts; or maintain internal business records.
- **For legal, safety or security reasons**, such as to comply with legal requirements; protect the safety, property or rights of Eaton, Services users, or others; and detect, prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity.
- **For marketing**. We may use your Personal Data to market our products or services or those of third parties. When required by law, we will seek your consent for such marketing.
- **In an anonymous or aggregated format**. We may also use your information in an anonymized or aggregate manner for any purpose.

When you install and open the Mobile Application, you may be asked to register with Eaton and thereby to establish an account. Establishing an account requires that you provide to Eaton your designated email address and that you select and enter a password. The Mobile Application may also request permission to send you notifications and to allow access your locations while using the Mobile Application, as well as request access to your camera or photos while using the Mobile Application. You may withhold your consent to receive notifications or to allow the Mobile Application to access your location, camera, or photos but doing so may impact your ability to fully utilize the Mobile Application. If applicable, after registering using the Mobile Application, you will be sent a verification email to the email address you provided for the purpose of verifying your account ID. You will be instructed to click on the link in the verification email to complete the registration process and to continue with your Mobile Application experience.

In addition to the information collected in the registration process described above, once you have registered, we may ask you for additional information to create a user profile such as your telephone number, address, and in some cases, credit card or other billing information for additional services you may order which may be stored by a third party processor with which we have a business relationship. Answering these questions allows us to establish and maintain your user account. After you complete the registration process, your account registration allows you to provide certain additional basic profile information, including photos. Names and profile photos may be shown to others in connection with the Mobile Application. You should only use photos you are willing to make public. Your email address will be stored and used as an identifier for you and for communications to you from Eaton.

With Whom Do We Share Your Information?

We may share your Personal Data with entities other than the Eaton entity that originally collected it, including the categories of recipients described below:

- **Affiliates and subsidiaries**: We may share your Personal Data within the Eaton group of companies, which includes parents, corporate affiliates, subsidiaries, business units and other companies that share common ownership for the purposes described above.
- **Third party service providers**: We may share your Personal Data with third party service providers working on behalf of Eaton in order to provide the Services you

request or support our relationship with you, such as IT providers, accountants, analytics companies, and marketing providers.

- **For legal, security and safety purposes:** We may share your Personal Data with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our [Terms of Use/Legal Notice/End-User License Agreement](#) and other agreements; and to protect our rights and the property or safety of Eaton, our users, or third parties.
- **In connection with a transaction:** If we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy, we will share your Personal Data with that entity.
- **Third parties for their own purposes:** We may sell your Personal Data to third parties for their own marketing, research, or analytics purposes.

We may also share Personal Information that has been anonymized or aggregated with third parties for any purpose.

Cookies and Other Tracking Technologies

Please click [here](#) for information about how we use cookies and other tracking technologies, including online behavioral advertising.

Data Security and Retention

Eaton maintains reasonable security procedures and technical and organizational measures to protect your Personal Data against accidental or unlawful destruction, loss, disclosure or use of personal data we handle. When handling your Personal Data for our business functions, Eaton will limit access to your Personal Data to authorized persons and trusted third parties who have a reasonable need to know the information in order to perform our Services who are bound by confidentiality obligations. While Eaton takes the issue of protecting your Personal Data seriously, you should exercise discretion in what information you disclose and/or transmit through the Services. Eaton cannot guarantee that information sent over the Internet is fully secure, and therefore the transmitted information may be intercepted by others before it reaches Eaton. If you are concerned about sending information to Eaton over the Internet, please send the information by mail or call us to make other arrangements. Eaton is not responsible for the security of information sent over the Internet.

Eaton retains Personal Data only for as long as necessary to fulfill the stated purpose for which the Personal Data was collected or otherwise processed, and thereafter only for legitimate legal or business purposes. These may include retention periods that are: (i) mandated by law, contract or similar obligations applicable to Eaton's business operations; (ii) for preserving, resolving, defending or enforcing our legal/contractual rights; or (iii) needed to maintain adequate and accurate business and financial records. We will delete Personal Data when the respective purpose for its use is complete and no legal obligation to retain such data exists.

Children's Privacy

The Services are intended for individuals 18 years of age and older. The Services are not directed at, marketed to, nor intended for, children under 18 years of age. Eaton does not knowingly collect any information, including Personal Data, from children under 18 years of age. If you believe that we have inadvertently collected Personal Data from a child under the age of 18, please contact us at the address below and we will take immediate steps to delete the information.

External Links

The Services may contain links to external sites or other online services, including those embedded in third party advertisements or sponsor information, that are not controlled by Eaton. Eaton is not responsible for the privacy practices and data collection policies for such third party services. You should consult the privacy statements of those third party services for details.

Terms of Use

The Terms of Use/Legal Notice/End-User License Agreement for the Services is incorporated by reference into this Statement, and can be found [here](#).

Contact Info/Your Choices

If you have questions regarding this Statement, please contact Eaton at:

Eaton
Attention: Global Data Protection and Privacy Office
1000 Eaton Boulevard
Cleveland, Ohio 44122
dataprotection@eaton.com

To opt-out of receiving promotional email messages from us, please click on the "Unsubscribe" link contained at the bottom of each email or by contacting us using the information above.

EEA Section

This section applies if you are an EEA data subject. In the event of a conflict between information in this section and the rest of the Statement, this EEA Section will govern.

Our legal basis for collecting and using the Personal Data as data controllers will depend on the Personal Data concerned and the specific context in which we collect it. In many cases, we will process Personal Data about you using the following legal basis:

- Legitimate interest – we process Personal Data to meet our legitimate business interests, such as to develop and improve our solutions, support our sales and business operations, and secure our systems, facilities and personnel.
- Legal obligation – we process Personal Data to comply with applicable laws and regulations.
- Performance of Agreement – we process Personal Data in order to perform or fulfill our obligations under an agreement with you or the entity with which you are affiliated.
- Consent – We may process your Personal Data based on consent. For example, if we want to send you a marketing communication, we will seek your consent. You may withdraw your consent at any time by contacting us at the information in the "Contact Us" Section above.

International Transfers of Your Personal Data

By using the Site or providing Personal Data to Eaton, your Personal Data is transferred to the United States where Eaton is headquartered. If you are not a resident of the United States, your country's laws governing data collection and use may differ from those in the United States. For example, the data protection laws of the United States have not been found by the European Commission to provide the same level of protection as EU data protection law. Transfers to countries outside the European Economic Area ("EEA") take place using an acceptable data transfer mechanism, such as the EU-U.S. Privacy Shield, the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and Certifications, or on the basis of

permissible statutory derogations. Please contact dataprotection@eaton.com, if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.

EU-U.S. Privacy Shield

Your Personal Data may be transferred to and processed in countries other than the country in which you are a resident. These countries may have data protection and privacy laws that are different to the laws of your country. You can find out more about the relevant countries by visiting <https://www.eaton.com/us/en-us/company/policies-and-statements/privacy-cookies-and-data-protection/international-data-transfers--privacy-shield-information.html> or contacting us (see below).

To learn more about the Privacy Shield program, the Privacy Shield Principles and to view our certification page, please visit the U.S. Department of Commerce's Privacy Shield List by clicking on the following link: <http://www.commerce.gov/privacysshield/>

Your EEA Privacy Rights

If you are visiting the Site from the EEA or where EEA data protection laws apply, with certain legal exceptions and limitations, you may exercise the following rights regarding your Personal Data:

Access. You have the right to confirm with us if your Personal Data is being processed and certain other information about that processing.

Rectification. You have the right to request the rectification of inaccurate Personal Data and to have incomplete data completed.

Objection. You have the right to object to the processing of your Personal Data for compelling and legitimate reasons. In addition, you have the right to object at any time if your Personal Data is processed for direct marketing purposes.

Portability. You may receive Personal Data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit that data to others.

Restriction. You may request to restrict processing of your Personal Data.

Erasure. You may request to erase your Personal Data.

Right to lodge a complaint. You also have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your residence.

Right to refuse or withdraw consent. Please note that in case we ask for your consent to certain processing, you are free to refuse to give consent and you can withdraw your consent at any time without any adverse negative consequences. The lawfulness of any processing of your Personal Data that occurred prior to the withdrawal of your consent will not be affected.

Right not to be subject to automatic decision-making, including profiling.

If you have questions about exercising any of your rights or whether they apply to a particular processing activity, you may contact us at: dataprotection@eaton.com.

How We Use Cookies and Automatic Data Collection Tools

When you access the Mobile Application or Services, open an e-mail marketing communication or download an Eaton mobile application, we or our third party service provider may collect information through the use of a "cookie" or other device recognition technology. These tools send a small file to your browser that is unique to you and can only be read by our or our third party service providers' web servers. These files provide information that helps us customize your experience on our websites or mobile application and provide relevant advertising to you.

Types of Cookies We Use

We or our third party service providers may use cookies or similar tools to collect information about your and other visitor's browsing behavior such as IP address, type of browser used, domain name and pages visited or mobile application usage. This information is used to learn about the usage and effectiveness of our web properties in order to improve how our Mobile Application or Services works and for advertising purposes. These cookies are session and persistent cookies. Some cookies may be used to track you across devices.

Specifically, we use the following cookies and tools:

Purpose	Provider/Type
Capture web metrics such as how often users visit this Site, what pages they visit when they do so, and what site referred a user to this Site.	Google Analytics, see Google Privacy Policy
Retargeting	
Provide digital advertising	
Measure effectiveness of marketing campaigns.	Eloqua, see Oracle website

Changing Cookie Preferences

Most browsers are set to accept cookies. Using the "help" feature on your browser (e.g., Google; Microsoft; Apple; Mozilla), you can manage your browser cookie preferences to, for example, automatically accept cookies, automatically decline cookies, or notify you before receiving a cookie.

You can find more information about cookies generally at: www.allaboutcookies.org.

If you use our websites, Mobile Application, or Services and choose not to disable cookies, you agree that we or our service provider can place them on your device. Please note that refusing a cookie may affect your ability to access certain content or functionality offered by our website, Mobile Application, or Services. We do not process or honor other "Do Not Track" signals.

Online Advertising

Eaton advertises on the websites or mobile applications of third parties. These third parties may use cookies or tools to gather information about your browsing activities in order to provide advertising relevant to your interests.

You can manage your receipt of targeted advertising by visiting these websites: in the EU, <https://www.youronlinechoices.eu/> and for U.S. and other regions, <http://www.aboutads.info/consumers>.

Marketing Communications

We provide digital marketing communications about our Services with an unsubscribe mechanism in each communication. You can unsubscribe from any particular communication by clicking on “unsubscribe” in the email itself.

This Statement was last updated on August 23, 2019.