



## Privacy Policy for the Switchee Thermostat

Thanks for reading this privacy policy for Switchee's smart connected thermostat. This is where we explain what information is collected by the Switchee thermostat and how that information is used. The privacy of all the information we receive and handle is important to us and reading this privacy policy will help you understand the information Switchee collects, and what we do with it.

Please note that where you visit our website ('Site') any personal information that we may collect about you and your visit to our Site is described in our separate website privacy and cookies policy.

If you have not heard of Switchee before, our full company name is Switchee Limited. We are a UK company delivering connected home technologies to housing providers and residents that helps residents to save money on their fuel bills and enables landlords to better maintain and support their properties and residents.

We do sometimes update this policy so you may want to return to our website and read it through again from time to time.

### What information does Switchee collect?

Switchee may collect certain information from landlords when a Switchee thermostat is installed and when it is set-up. We also collect environmental data from the operation of the Switchee thermostat and its sensors, as well as technical device information about the Switchee thermostat itself.

Installation and service information - at the time of first installation, the address of a property where a Switchee thermostat is to be installed is provided to Switchee by the landlord. This information enables Switchee to confirm to the landlord that the installation has occurred, so that Switchee can invoice the landlord for the installation and enables Switchee to share environmental data from the operation of the thermostat back to the landlord relevant to the property. See 'What information is shared' for more information about what data is shared with a landlord).

Where a Switchee thermostat is installed or serviced at a property that is already occupied, Switchee may be provided with the name and telephone contact information of the resident by the landlord in connection with scheduling an installation or service appointment. Resident name and telephone contact details are only retained by Switchee for a short period after the appointment in case of any queries and are then deleted.

Set up and usage information - the Switchee thermostat allows new residents to input some preliminary information about the heating routine at the property if they wish. This enables Switchee to provide an initial heating programme that reflects the resident's preferences. In addition, if residents make any direct changes to the temperature using the thermostat, the Switchee thermostat can learn from, and adapt to, these changes.

Sensor derived environmental information - Switchee collects environmental data from the Switchee thermostat's sensors. Over time, the Switchee thermostat can learn from this environmental data to predict patterns of use which help it to know when, for example, to turn the heating off or on, depending on whether there is anyone at home. It learns and predicts the energy needs of the property using these sensors, that collect information about the temperature, humidity and the light levels. The sensors can also detect if there is any movement in

a room and sense the presence of a mobile phone signal; these help indicate to the Switchee thermostat whether a property is occupied. Please note however that no identifiers relevant to a user's mobile phone are collected. The sensors can also detect temperature, pressure and humidity. This information can be used, for example, to help the landlord understand how the property is performing including information about the likelihood of mould and dust mite growth and thermal performance (how good the insulation is).

Thermostat device information - Switchee collects identifiers and technical information associated with the thermostat including the device model, serial number, software version, and settings. This information helps us to identify, support, troubleshoot and maintain the thermostat. Switchee does not collect IP addresses or any WiFi data at the property.

### How may Switchee use this information?

Switchee uses collected usage and environmental data from the Switchee thermostat, linked to the property address in order to:

- provide thermostat support services to landlords;
- operate the Switchee service for landlords and deliver cost savings to residents and landlords through smarter energy consumption;
- reply to any questions or enquiries received about the Switchee smart thermostat;
- contact residents, with their consent, in order to seek their feedback on ways we can improve the delivery of Switchee services;
- help us review and improve Switchee, services;
- carry out analysis, and provide environmental data reports to the landlord;
- provide service information where relevant to the delivery of Switchee.

### Sharing of information between Switchee and third parties

Subject to the resident's agreement with the landlord, Switchee shares statistical information about the operation of the Switchee thermostat at the property with the landlord. This information helps the landlord to better understand energy consumption levels across their properties and so that they can be more proactive in maintaining the quality of housing stock for residents, (for example in cases where increased humidity levels suggest a problem with damp or mould growth within a property that needs attention).

This information may also be used by landlords to protect high dependency residents where Switchee detects environmental data beyond safe parameters. For example Switchee may send notifications to the landlord if the temperature drops beyond a pre-agreed level during winter months. Summary occupancy profile data may also be provided to help landlords schedule maintenance and support visits to managed properties at times when someone is most likely to be at home. Residents can revoke or suspend their consent to the sharing of environmental data that is linked to their address by contacting Switchee

- by email at [info@switchee.co](mailto:info@switchee.co)
- by telephone on + 44 (0) 207 043 2310
- in writing at Switchee Limited, Wayra, 20 Air Street, London WC1E 6JA

Switchee may be provided with the name and telephone contact information of the resident at a property in cases where Switchee needs to schedule an appointment to install or service a Switchee thermostat for the landlord. In such cases, these personal details are only retained by Switchee for a short time following the appointment in case of any follow-up queries.

We may share and publish aggregate statistics and trends data about the use of Switchee thermostats generally to help us develop our services or so that others can understand what we do. This will not include any information that identifies individuals or individual properties. Where we work with employees, partners, housing providers or agents who are involved in delivering the Switchee services, these arrangements will be conducted and under appropriate contractual and confidentiality protections. If we're reorganised or sold to another organisation, we may transfer any personal information we hold to that organisation as part of the sale or re-organisation. We may also share information where we are required or allowed to do so by law or if we believe that this is necessary to protect the rights or safety of residents or landlords.

### Security

We place great importance on the security of all information processed on the thermostat and transmitted to Switchee. Information input and processed by Switchee does not include personal details that can directly identify residents to Switchee and all information is encrypted in transmission between Switchee and the Switchee server. We have implemented measures to seek to protect information against loss, misuse and alteration.

### Information storage

Switchee only stores collected environmental data linked to a property address and a landlord. In the event that Switchee is provided with personal information about a resident, either in response to a direct enquiry or a request by a landlord to schedule the installation or service of a Switchee thermostat, such data will only be retained for as long as it is necessary for the purpose it was provided.

Information that is collected by Switchee via the Switchee thermostat is stored on secure servers located in the European Economic Area ("EEA") This information may be transferred to countries outside the European Economic Area ("EEA") where, for example, one or more of our servers are from time to time in the future, located in a country outside the EEA or one of our service providers is located in a country outside the EEA. If we transfer your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected.

### Rights

Individuals have a legal right under the Data Protection Act 1998 to a copy of any personal information held about them. To the extent any personal information is processed by Switchee and on receipt of a valid request in writing, we will provide a copy of this information which may be subject to a fee not exceeding the prescribed fee permitted by law. Individuals also have a right to correct any errors in that information.

### Contacting us

Please submit any questions, concerns or comments you have about this privacy policy or any requests concerning your personal data by email to [info@switchee.co](mailto:info@switchee.co) or via the Contact Us page on our website.

### Version

This is version 1.3 of our privacy policy. The last time we updated this policy was on 21<sup>st</sup> November 2016.