data.protection@dormakaba.com

This document is intended for direct purchasers of dormakaba Canada Inc.’s (hereinafter referred to as "dormakaba") products and services.

Information is a key point to respect the fairness of the processing operation. Moreover, the right to be informed is a pre-requisite to all other data subjects' rights. In this context, the main quality of a good privacy statement is to provide essential easily readable information.

**Controller**

Unless otherwise stated, dormakaba is the controller for the processing of personal data collected through the dormakaba Oracode™ websites (www.kaba-ecode.com, www.kabaecodewireless.com, and www.kaba-ecode-mobile.com) subject to this Privacy Statement. Our address is 7301 Decarie Boulevard, Montreal, Quebec, H4P 2G7 (Canada).

If you have any questions about the use of your personal information, please email

data.protection@dormakaba.com.

**Personal Data We Collect**

The dormakaba Oracode™ websites collect personal data to operate effectively and to provide you the best experiences with our products. You provide some of this data directly, such as when you create an account on the Oracode websites. Each Oracode websites require separate registrations for access. dormakaba is not responsible for any loss or misuse of your username and password. ALWAYS REMEMBER THAT IN ORDER TO PROTECT YOUR PRIVACY YOU SHOULD NOT SHARE YOUR USERNAME OR PASSWORD WITH OTHERS. We collect personally identifiable information from you when you access the websites. We also collect personally identifiable information from you through voluntary sources on the websites, such as inquiries, registrations, comments, emails, postings, messages, or other electronic submissions and communications sent by you to dormakaba or the websites. The following data is collected:

GUEST

First name / Last name used for: Identification

Email address used for: Contact

Phone number used for: Contact

Comment/Message used for: Open field used for communication

Staff/Operator/Homeowner (Administrators)

First name / Last name / Middle Name used for: Identification

User name / Password used for: Identification

Email address used for: Contact

Phone number(s) used for: Contact

Role used for: Contact, function

Gender (inferred by Title, comments) used for: Contact, correct addressing

Language used for: Contact

Title used for: Contact, function

Company name used for: Contact, identification

Position used for: Contact

Delivery address used for: Contact, delivery

Comment/Message used for: Open field used for communication

**How We Use Personal Data**

dormakaba Oracode™ websites use the data we collect to operate our business and provide you the products and services we offer, which includes using data to improve our products. We also use the data to communicate with you, for example, informing you about your account, security updates and product information. We use your data for informing you about our own products supported but not for products offered by third parties. We do not and never will sell your data to third parties.

The legal basis is article 6 (1) 1, lit. f GDPR. You may object at any time to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing. Where you object to processing your data for direct marketing purposes, such personal data shall no longer be processed for such purposes.

**Reasons We Share Personal Data**

We share your personal data with your consent or as necessary to complete any transaction or provide any product you have requested or authorized. The legal basis is article 6 (1) 1, lit. b GDPR as such data is required for the performance of a contract with you. We also share data with dormakaba-controlled affiliates and subsidiaries; with vendors working on our behalf; when required by law or to respond to legal process; to protect our customers; to maintain the security of our products; and to protect the rights or property of dormakaba.

**How to Access & Control Your Personal Data**

Your administrator (Property Management Company, Certified Oracode Web Dealer, dormakaba) can view or edit your personal data for dormakaba Oracode™ websites by logging into the Oracode™websites using their username and password. To delete personal information, your administrator may contact dormakaba and submit a request for the information to be permanently deleted from the application. It is the responsibility of the administrator to inform dormakaba when it receives a request from its customer.

If you are in doubt, you can always send us an email via data.protection@dormakaba.com and submit a request that your data is deleted.

**Cookies & Similar Technologies**

dormakaba Oracode™ websites use cookies (small text files placed on your device) to help collect data for the purpose of system troubleshooting and support. Cookies permit the storing of your preferences and settings; enable you to sign-in; combat fraud; and analyze how our websites and online services are performing.

We collect the following data that we require from a technical point of view to display dormakaba Oracode™ websites to you and guarantee stability and security (the legal basis here is art. 6 (1) 1, lit. f GDPR):

* IP address
* Date and time of enquiry
* Time zone difference to Greenwich Mean Time (GMT)
* Content of request (specific page)
* Access status/HTTP status code
* Volume of data transmitted
* Website from which the request originated
* Browser
* Operating system and its interface
* Language and version of browser software.

You have a variety of tools to control cookies including browser controls to block and delete cookies and controls from some third-party analytics service providers to opt out of data collection. Your browser and other choices may impact your experiences with our products.

**Contact Form and Email**

If you contact us by email, the information you provide will be stored for the purpose of processing your request and for possible follow-up questions. We will not transfer your personal data to any third party without your consent. We do not and never will sell your data to third parties.

The processing of the information you provided to us via email will be processed on the basis of your consent (art. 6 (1) 1 lit. a GDPR). You can withdraw your consent at any time. We will not continue any data processing solely based on such consent withdrawn. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. In case your inquiry relates to concluding a contract or our support of any dormakaba products, processing of your personal data is also based on art. 6 (1) 1 lit. b GDPR.

Your personal data submitted by email will be retained by us until you ask us to delete your data, withdraw your consent or the purpose of the retention is achieved, e.g. your inquiry has been answered, unless any applicable legal provisions stipulate a longer retention period. Note that withdrawal of your consent from the Oracode™ system will effectively remove your ability to use the products and services associated with this product that you have paid for.

**Oracode™ Account Registration and Login, Purchases**

Signing into your Oracode™ System account enables improved personalization, provides seamless and consistent experiences across products and devices, and enables other enhanced features and settings.We process your login data (user name and password) in order to create and administer your account. In case you order any goods or services via your customer account, we will record and process all data submitted by you in order to execute your order and perform our contractual obligations.

When you sign into your account to access the information, we create a record of that sign in.

The legal basis for processing your account and order data is art. 6 (1) 1, lit. b GDPR) as these data are necessary to perform contracts with you on the use of your account and the perfomance of your orders respectively.

We will delete your account and any related data after you have ordered us to do so and no legal obligations which dormakaba is subject to, require a further retention of your data and after any applicable limitation periods for any potential claims of dormakaba according to applicable law have ended.

**Notice to End Users**

dormakaba Oracode™ is intended for the use by administrators (staff, operators, homeowners) and are administered to you by your administrator. Your use of dormakaba Oracode™ may be subject to your organization's policies, if any. If your organization is administering your use of dormakaba Oracode, please direct your privacy inquiries to your administrator. dormakaba Oracode™ websites are not responsible for the privacy or security practices of our customers, which may differ from those set forth in this privacy statement.

If you use an email address provided by an organization you are affiliated with, such as an employer or school, to access dormakaba Oracode online services, the owner of the domain (e.g., your employer) associated with your email address may: (i) control and administer your dormakaba Oracode online services account and (ii) access and process your data, including the contents of your communications and files.

Where children under the age of 16 are registered (access to schools, libraries, private use for example) in the dormakaba Oracode™ websites system, the organization is obliged to seek consent or authorization by the holder of parental responsibility over the child, taking into consideration available technology.

**Your rights**

You have the following rights with regard to your personal data:

* Right of access
* Right to rectification or completion or erasure
* Right to restriction of processing
* Right to data portability
* Right to lodge a complaint with a regulatory authority
* Right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.