

# GLOBAL PRIVACY POLICY

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**Effective Date: October 25, 2021**

## INTRODUCTION

The Chamberlain Group LLC and its subsidiary and successor entities listed under “Data Controller and Contact Information” below (collectively, “CGI”, “we”, “our”, or “us”) are committed to protecting your privacy. References in this policy to “CGI”, “we”, “us” and “our” are references to the entity responsible for the processing of your personal data. This entity is also referred to as the data controller.

This Privacy Policy describes the types of information CGI collects from and about you when you visit [www.chamberlain.com](http://www.chamberlain.com), [www.liftmaster.com](http://www.liftmaster.com), [www.chamberlaingroup.com](http://www.chamberlaingroup.com), [www.myq.com](http://www.myq.com), <https://dealer.liftmaster.com>, [www.chamberlain.eu](http://www.chamberlain.eu), [www.liftmaster.eu](http://www.liftmaster.eu), [www.myliftmaster.eu](http://www.myliftmaster.eu), [www.mychamberlain.eu](http://www.mychamberlain.eu), <https://chamberlain.de/de-de/shop/webshop-selector>, [https://www.shopssl.de/epages/es122868.sf/de\\_DE/?ObjectPath=/Shops/es122868](https://www.shopssl.de/epages/es122868.sf/de_DE/?ObjectPath=/Shops/es122868), [gomerlin.com.au](http://gomerlin.com.au), [gomerlin.co.nz](http://gomerlin.co.nz), [grifco.com.au](http://grifco.com.au), [chamberlaindiy.com.au](http://chamberlaindiy.com.au), [chamberlaindiy.co.nz](http://chamberlaindiy.co.nz) or any other of our websites where this Privacy Policy is posted (each a “Site”), use our mobile applications (each an “App”), including, without limitation, myQ<sup>®</sup> and myQ Community, use our products and/or services, including, without limitation, Tend Insights, IPAC, CapXL, CapXLV, LiftMaster Cloud Services, and HomeBridge or otherwise interact with us or request services from us as described further in this Privacy Policy. The Sites, Apps, and other interactions are collectively the “Services.” This Privacy Policy also explains how we may use and disclose such information, as well as your ability to control certain uses of your personal data.

Please read this Privacy Policy carefully. By using any of our Services, you agree to the collection, use, and disclosure of your personal data as described in this Privacy Policy. If any term in this Privacy Policy is unacceptable to you, please do not use the Services or provide any personal data.

## INFORMATION COLLECTION

- Information You Provide or We Collect About You Directly When Using Our Services

We collect several types of information from and about users of our Services, which may include information defined as personal data, personal information, or personally identifiable information under an applicable law (“personal data”).

For example, the personal data we collect from you may include, but is not limited to:

- Personal identifiers, such as name, mailing address and postal code, email address, telephone or mobile phone number, or government-issued ID number;
- Commercial information, such as credit or debit card number or other financial information (for example where you apply for a job with us and where permitted by applicable law);
- Employer-related information, such as your title and the company's name, address, phone number, or employee ID number;
- Dealer ID;
- User account information, such as CGI account number, user ID, or password;
- Information regarding the products or equipment or Services purchased;
- Information you provide to us about authorized users (e.g., guests or co-owners) who may have access to or be able to action your connected devices through one of our Sites or Apps. Information you provide about your authorized users may include their names or email addresses;
- Photographs (if you elect to upload one) or avatars which you choose to upload (if available); and
- Charges you incur and other information relating to your transactions.

Depending on the country in which you use our Services and subject to applicable laws, the personal data we collect from you may, for example, also include, but are not limited to:

- Biometric information, such as facial recognition;
- Video images and audio of you and those that come within range of your cameras; and
- Protected classification information, such as age, gender, nationality, date of birth, or marital status.

We collect such personal data directly from you through our Services, when, for example, you:

- Complete forms on our Sites or in our Apps. This includes information provided when you sign up for our products, services, newsletters, emails and other types of information material; when we process and respond to your inquiries related to products, tech data sheets, technical support and customer service; search for a retailer or dealer; or when you provide feedback on our Services;

- Register for an account on or otherwise use our Apps. This information may include, for example, registration data such as your name and email address or the connected devices you have installed;
  - Provide to us information about authorized users (e.g., guests or co-owners) who may have access to or be able to action your connected devices through one of our Sites or Apps. Information you provide about your authorized users may include their names and email addresses;
  - Correspond with us. This includes information and personal data contained in records and copies of your correspondence with us, including your participation in a survey or promotion, request for information, or when you otherwise contact us;
  - Use or register one of our products or connected devices or Services. We collect details of actions you or your authorized users initiate through our Apps. For example, we will collect logs of when a garage door is opened or closed through the Services. This data may be available to other authorized users, depending on their level of permission, through device history logs within the App; and
  - Purchase a product or service. We collect commercial information, such as credit or debit card number or other financial information.
- **Information Collected from Third Parties or Other Sources**

Subject to applicable law, we may obtain personal data or other information about you from third parties or other sources, and combine this information with the information we collect from and about you through the Services. Such information may include, but is not limited to:

- Information obtained through communications that you make through a third party, such as through our network of independent retailers and/or dealers;
- Information obtained through transactions you complete with us or our retailers, including charges you incur;
- Information about your credit history or other publicly available information about you from consumer reporting agencies;
- Any other information obtained through companies that have business relationships with us, such as our licensees, affiliates, and business partners; and
- Information, including your name and email address, provided by another user in order to invite you to set up an account as an authorized user of a connected device or one of our other products.

Subject to applicable law, we may also obtain information and personal data about you from other online sources, including when you connect with us through our official corporate pages on third party social networks (such as Facebook) or the “apps” on those pages. This information may include, but is not limited to, name, user name, demographic information, updated address or contact information, interests, and publicly-observed data, such as from social media and online activity. We may combine this information with the information we collect from and about you through the Services.

## ● Information Automatically Collected

As with many other websites and “apps”, as you navigate through and interact with our Services, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, patterns, and connected device, including:

- Details of your visits to our Services, including resources that you access and use on our Services, the areas or pages of the Site or App that you visit, the amount of time you spend viewing the Site or App, traffic data, location data, logs, language, date and time of access, frequency of your return to the Site or App, other click-stream or Site/App-usage data, emails that you open, forward or click-through to our Site or App, and other communication data;
- Information about your computer, mobile devices and internet connection, including your IP address, geolocation, operating system, software version, phone model, phone operating system, domain name from which you accessed the Services, and browser type;
- Device information, including the model, serial number, and technical information about the device you have installed and other information you choose to share about the product while using our Services, including but not limited to the device status for entryway products and logging information regarding device usage;
- Details of referring websites (URL);
- Details of actions you or your authorized users initiate with your connected devices through our Apps. Please note that this data may also be available to other authorized users, depending on their level of permission, through device history logs within the App, as described further in the “Information Sharing” section below; and
- Anonymized historic App data for programming testing purposes.

The information we collect automatically is statistical data that helps us improve our

Services and deliver a better and more personalized service, including by enabling us to:

- Determine traffic patterns;
- Count visits;
- Determine traffic sources so we can measure and improve the performance and security of our Services;
- Help us to know which pages and content are the most and least popular;
- Observe search patterns to provide more intuitive navigation cues;
- Determine user frequency and recency; and
- Troubleshoot unexpected issues with your connected devices.

- **Cookies Used on the Services**

We and certain third parties may use cookies, web beacons, pixel tags, JavaScript, or other technologies to collect certain information about visitors to our Sites or Apps and interactions with our emails and online or mobile advertisements, and may use such information to allow CGI to keep track of analytics and certain statistical information that enables us to improve our Sites and Apps and provide you with more relevant content and advertising on our Sites, Apps, or other websites or mobile applications. Our Services use single-session (temporary) and multi-session (persistent) cookies. Temporary cookies last only as long as your web browser is open and are used for technical purposes such as enabling better navigation on our Services. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes which include tracking the number of unique visitors to our Services and information such as the number of views a page gets; how much time a user spends on a page, and other pertinent web statistics. If you wish to disable the use of cookies or remove them at any time from your computer, you can disable or delete them using your browser (consult your browser's "Help" menu to learn how to delete cookies); however, you must enable cookies to access certain information on our Sites and/or Apps.

Our system may not respond to Do Not Track requests or headers from some or all browsers. Certain parts of our Sites and/or Apps may also include advertisements from third parties. You can opt-out of being targeted by certain third-party ad-servers and CGI served ads online using the National Advertising Initiative's opt-out tool, the About Ads opt-out tool. To learn more about the use of cookies or other technologies to deliver more relevant advertising and to know your choices about

not having this information used by third-party advertisers, please visit <http://www.networkadvertising.org> and <http://www.aboutads.info/choices/>.

You can manage or disable cookies at any time not only by adjusting your device or browser settings but also at our <Privacy Preference Center> when visiting or accessing our Sites and Apps. We use four types of cookies: strictly necessary cookies, performance cookies, functional cookies and targeting cookies for marketing purposes. For more information on these types of cookies, including the type, duration and description of the cookie, please visit our <Privacy Preference Center>. Where the placement of cookies involves the processing of personal data, the legal basis for processing personal data in connection with strictly necessary cookies is our legitimate interest in the functioning of our Sites and Apps. For the processing of personal data in connection with performance cookies, functional cookies and targeting cookies for marketing purposes, the legal basis is your consent provided at our <Privacy Preference Center>.

- **For EEA Users: Information on Our Use of Google Analytics**

If you have provided your consent at our <Privacy Preference Center>, our Sites and Apps may use Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses cookies that enable an analysis of your use of our Sites and Apps.

We use the function 'anonymizeIP' (so-called IP-Masking). If IP anonymization is activated on the Sites and Apps, your IP address will be truncated within the EEA. Only in exceptional cases will the whole IP address first be transferred to a server in the United States and truncated there. The IP anonymization is active on the Sites and Apps. The IP address that your browser conveys within the scope of these web analytics services will not be associated with any other data held by Google.

During your visit to our Sites and Apps, the following data may be collected:

- The pages you call up, your “click behavior”;
- Achievement of “goals” (conversions, e.g., newsletter registrations, downloads, purchases);
- Your user behavior (e.g., clicks, time spend, bounce rates).
- Your approximate location (region);
- Your IP address (in abbreviated form);
- Technical information about your browser and the end devices you use (e.g.,

language settings, screen resolution);

- Your internet provider; and
- The referrer URL (the website/advertising medium from which you came to this website).

On our behalf, Google will use this information to evaluate your (pseudonymous) use of our Sites and Apps to compile reports on the activities. The reports provided by Google Analytics are used to analyse the performance of our Sites and Apps.

The recipient of the data is Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. More information about the contractual arrangements for the processing of personal data with Google can be found at <https://privacy.google.com/businesses/processorterms/> and <https://privacy.google.com/businesses/controllerterms/>. Access by US authorities to the data stored by Google cannot be ruled out.

The information generated by the cookies about your use of the Sites and Apps will be transmitted to and stored by Google on servers in the United States or other countries outside the EEA. For more information about the safeguards implemented with Google for international data transfers, please visit <https://privacy.google.com/businesses/processorterms/>.

You can prevent the collection of data generated by the cookie and related to your use of our Sites and Apps (including your IP address) and the processing of this data by Google by not providing your consent to the setting of the cookie at <Privacy Preference Center> or for website-based use, downloading and installing the browser add-on to disable Google Analytics [[HERE](#)].

You can also prevent the storage of cookies when using our Sites by configuring your browser software accordingly. However, if you configure your browser to reject all cookies, this may limit functionality on the Sites.

The legal basis for this data processing is your consent. You can withdraw your consent at any time, with future effect, by accessing the cookie at <Privacy Preference Center> and changing your preferences.

It cannot be ruled out that Google uses the data described in this section for its own purposes and links it to other data such as possibly existing Google accounts.

For more information about Google Analytics' terms of use and Google's privacy policy, please visit <https://marketingplatform.google.com/about/analytics/terms/gb/> and <https://policies.google.com/?hl=en>.

- **Combination of Information**

Subject to and in accordance with applicable law, we may combine the information we receive from and about you, including information you provide to us and information we automatically collect through our Sites and Apps, as well as information collected from other online sources or from third-party sources to help us tailor our communications to you and to improve our Services.

## INFORMATION USE

Below is information on how we process the information collected about you (including personal data), as well as the corresponding legal basis. We may process your information where the processing is:

- Necessary for entering into, or the performance of, a contract with you. For example:
  - To carry out our obligations arising from any contracts entered into between you and us, and to provide you with the information, products and services you request from us;
  - To manage job opportunities at CGI for recruitment and other HR-related purposes; and
  - To validate, confirm, verify, and track your account, products or services (including to process payment card transactions, or to contact you about your account, products or services).

The personal data are necessary to enter and perform the contractual relationship with you. Without such information, we may not be able to enter into and honor the contractual relationship with you.

- Necessary for us to comply with a legal obligation.
  - The processing of your personal data is a statutory requirement.
- Necessary for the purposes of the legitimate interests pursued by a third party or us (to the extent it does not infringe on any individual's fundamental rights and freedoms). For example:
  - To allow you to participate in interactive features of our Services (when you choose to do so);
  - To keep our Services safe and secure.
  - To provide you with technical support and to improve our content, products and Services;

- To provide you with information that you have requested and respond to your enquiries;
- To notify you of changes to our Services;
- If you are an existing customer, to communicate (including by email and SMS) with you to provide information about goods and services similar to those that were the subject of a previous sale or, where permitted by applicable law, negotiations of a sale to you;
- To protect the security and integrity of the Sites, Apps, and our business, such as by protecting against fraud, unauthorized transactions, claims and other liabilities and managing risk exposure, including by identifying potential hackers and other unauthorized users;
- Subject to applicable law and regulations, in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, to transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, personal data that you provide and other information concerning your relationship with us;
- To anonymize historic App data for programming testing purposes;
- To use your data in an aggregated non-specific format for analytical and demographic purposes;
- To troubleshoot unexpected issues with your connected devices and other CGI products; and
- If you use any of the Sites or Apps to connect with third party services to use information from and about you, on your behalf, to interact with these third party services based on your requests.

The provision of our personal data is necessary to provide you with the respective service. Without such information, we may not be able to deliver the respective service to you.

- Pursuant to valid consent, depending on the country in which you use our Services and subject to applicable laws, provided by you, in order:
  - To present the content from our Services in the most effective manner for you and for your device, and across different Services;
  - To provide you with certain services in an App or on a Site or information about goods or services we feel may interest you. For example, to contact you with information, newsletters, promotional materials, and contests from CGI or on behalf of our business partners,

licensees, and affiliates. They may use a pixel tag or other similar technology to collect information about your visits to Sites and Apps, and they may use that information to target advertisements for our products and Services;

- To enhance your online experience if you are an user in the EEA, including as a way to recognize you and welcome you to a Site or App, make the account usage and purchasing process faster and smoother and provide you with customized Site or App content, targeted offers, and advertising on Sites, Apps (including geo-targeted advertising), or via email, telephone, text message, or by mail;
- To recognize your online activities over time and across different Services and improve our content, products, and services; and
- For any other purpose where you have provided valid consent where it is legally required.

The provision of your personal data for such purposes is voluntary. If you do not want us to use your data in this way, simply do not opt in when we ask for your consent on the relevant forms or at <Privacy Preference Center> on our Sites or Apps where we collect your data. You can withdraw your consent at any time with effect for the future and can always **exercise your right to ask us not to process your personal data for marketing purposes** by contacting us as specified in the section “YOUR PRIVACY RIGHTS” or with regard to cookies, by managing your preferences via our <Privacy Preference Center> on our Sites and Apps.

## INFORMATION SHARING

Subject to applicable law and regulations, CGI may disclose the personal data we collect from and about you in the following ways:

- With our affiliated companies, installers, retailers and dealers, including subsidiaries of such companies;
- With our third party service providers that provide business, professional or technical support functions for us and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them;
- With our agents, licensees, and other companies that assist us in providing a product or service to you, including, but not limited to, making your purchase and installation; providing you with customer assistance; processing and/or confirming your transactions; providing you with the services you requested;

assessing creditworthiness; billing and collecting any amounts owed in connection with your account or products or services purchased; or recovering any monies due, such as through debt collection agencies;

- With our select licensees, affiliates, retailers and business partners that we believe may have offers of interest to you, including for their own marketing purposes;
- As necessary if we believe that there has been a violation of our terms of use or of our rights or the rights of any third party;
- To respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law;
- With authorized users of a connected device, which, depending on their level of permission, may receive your user profile data and have access to device history logs within the App. If you do not wish to share this data with other authorized users, you may decline the invitation you received to use the App;
- As otherwise described to you at the point of collection or with your consent when required by applicable law and regulations; and
- With a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal data held by one or more of our entities about our users is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal data provided through the Services in a manner that is consistent with this Privacy Policy.

CGI may also share aggregate or anonymous non-personal information about you and other users with third parties for their marketing or analytics uses, without restriction.

## CROSS-BORDER TRANSFERS OF PERSONAL DATA

The personal data that we collect from you may be transferred to, and stored at, a destination outside the country in which it is collected, including, with respect to EEA residents, outside of the EEA. It may also be processed by staff operating outside the EEA who work for us or other entities acting as data processors processing personal data on behalf of us. This includes staff engaged in, among other things, the fulfilment of your request or order and the provision of support services. CGI has implemented international data transfer agreements on the basis of EU

Standard Contractual Clauses in order to provide appropriate and suitable safeguards for personal data being transferred to countries outside the EEA where an adequate level of protection is not already guaranteed. A copy can be obtained by contacting [GDPR@Chamberlain.com](mailto:GDPR@Chamberlain.com). We will take all steps reasonably necessary to ensure that your personal data is treated securely and subject to appropriate safeguards in accordance with this Privacy Policy and applicable laws.

## DATA RETENTION

Unless otherwise required by law, CGI will also erase personal data when it is no longer necessary in relation to the purposes for which it was collected or otherwise processed; when you withdraw your consent (where lawfulness of processing was based on your consent) and there is no other legal ground for the processing; when you object to the processing and there are no overriding legitimate grounds for the processing; when your personal data has been unlawfully processed; and when it is necessary to comply with legal obligations.

For example, CGI will maintain basic information about your account for as long as your account is active, or warranty information for the life of the warranty. Similarly, CGI will keep device state and logging information for 30 days, after which the data will be automatically deleted.

## YOUR PRIVACY RIGHTS

Under applicable law and regulations, you may, at any time, exercise certain rights, as described below.

- For Residents of the European Union / European Economic Area

We remind you that you may at any time exercise certain rights you may have under applicable law and regulation, including the following rights:

- The right to request access to your personal data, which includes the right to obtain confirmation from us as to whether or not personal data concerning you is being processed, and where that is the case, access to the personal data and information related to how it is processed;
- The right to rectification or erasure of your personal data, which includes the right to have incomplete personal data completed, including by means of

providing a supplementary statement, and certain rights to request us to erase your personal data without undue delay;

- The right to restrict or object to processing concerning your personal data, which includes restricting us from continuing to process your personal data under certain circumstances (e.g., where you contest the accuracy of your personal data, processing is unlawful, your personal data is no longer needed for the purposes of processing, or you have otherwise objected to processing related to automated individual decision-making);
- The right to data portability, which includes certain rights to have your personal data transmitted from us to another controller;
- Where data processing is based on your consent, the right to withdraw consent at any time; and
- The right to lodge a complaint with a supervisory authority.

Any requests related to the above rights may be made by completing the Data Subject Rights webform found [here](#) or sending an email to [GDPR@Chamberlain.com](mailto:GDPR@Chamberlain.com).

- **For Residents of California**

If you are a California resident, the California Consumer Privacy Act (“CCPA”) (Civil Code Section 1798.100, et seq.) may provide consumers with specific rights regarding your personal data. These may include:

- **Information about Collection, Sale or Disclosure:** You have the right to be informed of the categories of personal data that we collect about you, the categories of sources from which the personal data was collected, the business or commercial purposes for which the personal data is used, disclosed, or sold, and the categories of third parties with whom we share the personal data, as set forth in this Privacy Policy.
- **Access to Specific Information:** You have the right to request that we disclose certain information to you about our collection and use of your personal data over the past twelve months. Once we have verified your identity, we will disclose the specific pieces of personal data we collected about you, which will be made in writing and delivered through your account with us, if you maintain such an account. If you do not maintain an account with us, we will provide such information electronically, at your option, in a readily useable format that allows you to transmit the information from one entity to another entity without hindrance.

- **Deletion Request Rights:** You have the right to request that we delete any of your personal data that we collected from you and retained, subject to certain exceptions.
- **Personal Data Sales Opt-Out Rights:** You have the right to opt out of the sale of your personal data. You can exercise this right by completing our [web form](#).

To exercise the rights described above, it is necessary for us to verify your identity or authority to make the request and confirm the personal data relates to you. To verify your identity, we may ask you to provide your full name, telephone number, and address.

Only you or an authorized agent (“Authorized Agent”) may make a verifiable consumer request related to your personal data. When an Authorized Agent is submitting a request on your behalf, we require your Authorized Agent to provide evidence of their entitlement, which must include information sufficient to identify you and the purpose of the request, and at least one of the following:

- written and signed permission designating the Authorized Agent to act on your behalf. You must verify your identity with us and directly confirm with us that you have provided the Authorized Agent permission to submit the request;
- evidence that you have provided the Authorized Agent with power of attorney pursuant to the California Probate Code; or
- proof that the Authorized Agent is a person or business entity registered with the California Secretary of State and that you have authorized such person or business entity to act on your behalf.

Absent such documentation, we reserve the right to refuse to comply with third-party requests for information.

You also may make a verifiable consumer request on behalf of your minor child.

- **Non-Discrimination:** Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under the CCPA or applicable law, including by denying you goods or services; charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing you a different level of quality of goods or services; or suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

If you are a California resident and would like to request a copy of this notice or exercise your rights under the CCPA, please contact us:

- [Click here to visit our Consumer Rights Requests web form](#)
- Requests can be submitted by postal mail, phone or email to:  
 The Chamberlain Group LLC  
 Attn: Compliance Department  
 300 Windsor Drive  
 Oak Brook, IL 60523  
 Telephone: 833-620-0260  
 Email: [privacy@chamberlain.com](mailto:privacy@chamberlain.com)

CGI will confirm receipt of the request within 10 days and explain how it will process the request. CGI will then respond to the request within 45 days. CGI may require an additional 45 days (for a total of 90 days) to process your request, but in those situations, CGI will provide you a response and explanation for the reason it will take more than 45 days to respond to the request.

Non-affiliated third parties are independent from CGI and if you wish to receive information about your disclosure choices or stop communications from such third parties, you will need to contact those non-affiliated third parties directly.

*Disclosures of Your Personal Data for a Business Purpose*

In the twelve months preceding the effective date of this Privacy Policy, we may have disclosed your personal data for a business purpose to the following categories of third parties:

Categories of Personal Data	Categories of Third Parties
Personal Identifiers (e.g., name, address, email address, telephone, or mobile number)	<ul style="list-style-type: none"> <li>• Affiliated companies and subsidiaries;</li> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners;</li> <li>• Service Providers who provide professional or technical support functions;</li> <li>• Logistics Suppliers;</li> <li>• Users you authorize or who have authorized you to use a connected</li> </ul>

	<p>device or product through our App;</p> <ul style="list-style-type: none"> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or online advertising; and</li> <li>• Professional Service Organizations, such as an external auditor or law firm.</li> </ul>
<p>Personal Records (e.g., signature, contact details, user ID, or other similar information)</p>	<ul style="list-style-type: none"> <li>• Affiliated companies and subsidiaries;</li> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners;</li> <li>• Service Providers who provide professional or technical support functions;</li> <li>• Logistics Suppliers;</li> <li>• Users you authorize or who have authorized you to use a connected device or product through our App;</li> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or online advertising; and</li> <li>• Professional Service Organizations, such as an external auditor or law firm.</li> </ul>
<p>Protected Classification Information (e.g., age, sex, gender, nationality, date of birth, or marital status)</p>	<ul style="list-style-type: none"> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners;</li> <li>• Service Providers who provide professional or technical support functions; and</li> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or</li> </ul>

	online advertising.
Commercial Information (e.g., credit or debit card number or other financial information, information about products or equipment purchased, or charges you incur and other information related to your transactions)	<ul style="list-style-type: none"> <li>• Affiliated companies and subsidiaries;</li> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners; and</li> <li>• Service Providers who provide professional or technical support functions.</li> </ul>
Biometric Information	<ul style="list-style-type: none"> <li>• Service Providers who provide professional or technical support functions.</li> </ul>
Audio or Visual Information (e.g., video images and audio of you and those that come within range of your cameras)	<ul style="list-style-type: none"> <li>• Service Providers who provide professional or technical support functions.</li> </ul>
Geolocation Information (e.g., computer, mobile device, or other electronic device used to access a Site or App)	<ul style="list-style-type: none"> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners; and</li> <li>• Service Providers who provide professional or technical support functions.</li> </ul>
Internet Usage Information (e.g., browsing time, cookie information, Internet Protocol (“IP”) address, or website history)	<ul style="list-style-type: none"> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners;</li> <li>• Service Providers who provide professional or technical support functions; and</li> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or online advertising.</li> </ul>
User Account Information	<ul style="list-style-type: none"> <li>• Business Partners, which may include, for example, our retailers, dealers, and</li> </ul>

<p>(e.g., CGI account number, information you provide to us about authorized users of an account who may have access to a connected device or App, photographs (if you elect to upload one), or avatars which you choose to upload (if available))</p>	<p>integration partners;</p> <ul style="list-style-type: none"> <li>• Service Providers who provide professional or technical support functions; and</li> <li>• Users you authorize or who have authorized you to use a connected device or product through our App.</li> </ul>
<p>Inferences Drawn from Personal Data (e.g., profile reflecting a person’s preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes)</p>	<ul style="list-style-type: none"> <li>• Business Partners, which may include, for example, our retailers, dealers, and integration partners; and</li> <li>• Marketing Partners, which may include, for example, entities that assist us with market research or online advertising.</li> </ul>

*Sales of Personal Data*

In the twelve months preceding the effective date of this Privacy Policy, we may have sold—as this term is defined under the CCPA—certain categories of your personal data to third parties.

We may have sold or disclosed for valuable consideration certain categories of your personal data to our business partners (e.g., integration partners that supplement our Services and to whom you choose to link one of our products or Services). The categories of personal data we disclose to business partners in this manner may include your personal identifiers; personal records; commercial information; internet usage information; and user account information. To exercise your right to opt-out of the sale of your personal data to our business partners, please complete our [“Do Not Sell My Personal Information”](#) form or contact us using the information provided in the “Contact Us” section below.

Like many organizations, we engage services that deliver interest-based advertisements to you. In order to deliver these advertisements to you, we may make available or transfer your personal data (e.g., internet usage information, such as browsing history, online identifiers, such as an IP address, and inferences drawn about your use of ours or other services) to our marketing partners (e.g., entities that perform advertising or analytics services). To the extent that “sale” under the CCPA is interpreted to encompass such advertising and analytics practices, you may request

to opt out by filling out our “[Do Not Sell My Personal Information](#)” form or by contacting us using the information provided in the “Contact Us” section below. You also may adjust your device or browser’s settings to limit how your internet usage data and device data is shared with third parties. Please refer to the “Information Collection” section, subsection “Cookies Used on the Services”, for references to tools for adjusting your preferences.

- For Residents of Australia and New Zealand

#### *Applicable Privacy Requirements*

For users accessing a Site in Australia and New Zealand, applicable privacy requirements we comply with include:

- In Australia, the *Privacy Act 1988* (Cth) including the Australian Privacy Principles, the *Spam Act 2003* (Cth), the *Do Not Call Register Act 2006* (Cth) and applicable state/territory health privacy laws and any mandatory standards or industry codes; and
- In New Zealand, all applicable New Zealand laws, statutes and regulations, including without limitation the *Privacy Act 2020* and the *Unsolicited Electronic Messages Act 2007*.

In this section of the Privacy Policy, the term “Personal Information” includes, as applicable, in Australia, the meaning given to “Personal Information” under the *Privacy Act 1988* (Cth), and in New Zealand, the meaning given to the same term under the *Privacy Act 2020* (NZ).

#### *Using Personal Information*

If we use your Personal Information to contact you and you would prefer us not to, or if you indicate a preference for a method of communication, please let us know and we will respect your preference. When your choice is to continue to deal with us, we take it that you agree to and consent to us using your Personal Information, providing we follow the approach we explain in this Privacy Policy and comply with the law.

#### *Storing and disclosing your Personal Information*

Residents of Australia and New Zealand accessing and using the Sites are notified that your Personal Information may be held and processed overseas. Overseas countries where your data may be stored include the United States (as The Chamberlain Group, LLC is headquartered in Illinois) and other locations where Chamberlain has operations. When we pass on or share your Personal Information

in this way, we take steps to ensure it is treated in the same way that we would treat it and we comply with applicable law. Where reasonably possible, we seek to work with information and records from which Personal Information has been removed.

#### *Requests for access to your Personal Information and complaints about privacy*

You may wish to contact us to request access to your Personal Information, to seek to correct it or to make a complaint about privacy. Our contact details are set out below.

We will respond to your request for access to Personal Information we hold about you as soon as we reasonably can, including if we are unable to provide you with access (such as when we no longer hold the information).

We do not impose any charge for a request for access, but we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs.

For complaints about privacy, we will establish in consultation with you a reasonable process, including timeframes, for seeking to resolve your complaint.

- For Residents of Canada

#### *Applicable Privacy Requirements*

For users in Canada accessing a Site or App, applicable privacy requirements we comply with include: the *Personal Information Protection and Electronic Documents Act*, (S.C. 2000, c. 5), *An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act* (S.C. 2010, c. 23), the *Unsolicited Telecommunications Rules*, (Canadian Radio-television Telecommunications Commission Telecom Decision 2007-48, as amended) and applicable provincial privacy law and any mandatory standards or industry codes.

In this section of the Privacy Policy, the term “personal information” include, the meaning given to “personal information” under the *Personal Information Protection and Electronic Documents Act*, (S.C. 2000, c. 5).

#### *Using Personal Information*

If we use your personal information to contact you and you would prefer us not to, or if you indicate a preference for a method of communication, please let us know and we will respect your preference. When your choice is to continue to deal with us, we take it that you agree to and consent to us using your personal information, providing we follow the approach we explain in this Privacy Policy and comply with the law.

### *Storing and disclosing your personal information*

Residents of Canada accessing and using the Sites are notified that your personal information may be collected, stored and processed by CGI and its service providers located in other countries, include the United States (as The Chamberlain Group, LLC is headquartered in Illinois), Germany, France, the United Kingdom, Scandinavia, the Benelux, Southern and Eastern Europe, the Middle East, South Africa, Australia, New Zealand, Mexico, Central and South America, Singapore and China. When we transfer your personal information in this way, we take steps to ensure it is treated in the same way that we would treat it and we comply with applicable law. Where reasonably possible, we seek to work with information and records from which personal information has been removed. If you would like to receive more information about our use of service providers globally, please contact us at the address listed below.

### *Requests for access to your personal information and complaints about privacy*

You may wish to contact us to request access to your personal information, to seek to correct it or to make a complaint about privacy. Our contact details are set out below. To guard against fraudulent requests for access and deletion, we will require information that we determine is sufficient to allow us to confirm the identity of the person making the request before granting access or making corrections.

We will respond to your request for access to personal information we hold about you as soon as we reasonably can. Your right to access is not absolute. We may refuse access as permitted under applicable Canadian law, including in situations where access:

- May disclose:
  - The personal information of another individual ; or
  - Trade secrets or other business confidential information;
- Is subject to attorney-client or litigation privilege or a professional privilege or obligation;
- Does not exist, is not held, or cannot be found by CGI;

- Could reasonably be expected to threaten the life or security of another individual; or
- May harm or interfere with law enforcement activities or other investigative or regulatory functions of a body authorized by statute to perform such functions.

We do not impose any charge for a request for access, but we may charge you a reasonable fee for our costs associated with providing you with access and retrieval costs. Where you are granted access and you demonstrate that the personal information that we hold about you is incorrect or incomplete, we will correct or supplement it, as applicable.

For complaints about privacy, we will establish in consultation with you a reasonable process, including timeframes, for seeking to resolve your complaint.

## LINKS TO OTHER WEBSITES

The Sites, Apps, and email messages from us may contain links to third-party websites and “apps”, which may have privacy policies that differ from our own. You should be aware that the collection, retention and use of any data you provide on these websites will be governed by the privacy policy of the company providing the website and not by this Privacy Policy. CGI therefore encourages you to read the privacy statements and terms and conditions of linked or referenced websites and apps you enter. These third-party websites and apps may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit personal data. We are not responsible for the practices of such websites or apps.

## PUBLIC FORUMS

Any information you may disclose in blogs, on message boards, in chat rooms, or on other public areas on a Site, App, or other third-party website that the Site or App may link to, becomes public information. Please exercise caution when disclosing personal data in these public areas. We reserve the right to remove any posting or content in a posting at our sole discretion.

## CHILDREN’S PRIVACY

Protecting children’s privacy is important to us. We do not direct our Sites or Apps to, nor do we knowingly collect any personal data from, children under the age of 13 (or 16 where applicable by law). If we learn that a child has provided personally identifiable information to a Site or App, we will use reasonable efforts to remove such information from the files of such Site or App. If you believe we might have any information from or about a child, please contact us at [privacy@Chamberlain.com](mailto:privacy@Chamberlain.com).

## DATA SECURITY

We have taken certain physical, administrative, and technical steps to safeguard the information we collect from and about our customers and Site and App visitors. While we make every reasonable effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures. When you enter sensitive information (such as credit card information) on our forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

## YOUR OPTIONS AND ACCESS TO YOUR PERSONAL DATA

**We provide you with the opportunity to opt-out of having your personal data processed where we process your personal on the basis of our or a third party’s legitimate interest or where we process your personal data for marketing purposes. To “opt out” of receiving future e-mail marketing messages from CGI, you can click on the “unsubscribe” link at the bottom of an e-mail marketing message or by [clicking here](#). To access, review, or update your information stored by CGI, you may visit the Account Profile page on the Sites and Apps, where you can view, update, or change your personal data and update your member profile, password, and associated information. You can manage your preferences with regard to our use of Cookies via our <Privacy Preference Center> on our Sites and Apps.**

If you have any additional questions concerning access to or updating your personal data, please contact us at the information provided in the “Data Controller and Contact Information” section below.

# DATA CONTROLLER AND CONTACT INFORMATION

We hope this Privacy Policy answers your questions about our collection, use and disclosure of your personal data. If you have additional questions about this Privacy Policy or the practices described herein, you may contact us at:

- [Click here to visit our Consumer Rights Requests webform](#)
- For individuals in the U.S. and Canada, contact us by postal mail, phone, or email at:

The Chamberlain Group LLC  
Attn: Compliance Department  
300 Windsor Drive  
Oak Brook, IL 60523  
833-620-0260  
Email: [privacy@chamberlain.com](mailto:privacy@chamberlain.com)

- For individuals in the EU or EEA, contact us by postal mail, phone, or email to:

Chamberlain GmbH  
Saar-Lor-Lux-Str.19  
D-66115 Saarbrücken  
Email: [GDPR@Chamberlain.com](mailto:GDPR@Chamberlain.com)  
+(49) 681 87080-0

Should you have any questions or concerns about this Privacy Policy and our privacy practices, you may also contact the Data Protection Officer of Chamberlain GmbH at:

Dr. Sebastian Kraska Rechtsanwalt,  
Dipl.-Kfm.  
Externer Datenschutzbeauftragter

IITR Datenschutz GmbH  
Marienplatz 2  
80331 München, Germany(49) 89-1891-7360

[GDPR@Chamberlain.com](mailto:GDPR@Chamberlain.com)

Sitz: Eschenrieder Str. 62c, 82194 Gröbenzell

Registergericht: Amtsgericht München  
Handelsregisternummer: HRB 170081  
Geschäftsführer: Dr. Sebastian Kraska  
USt.-ID. GmbH: DE256675995  
USt.-ID. RA: DE814144498

- For individuals in Australia and New Zealand, contact us by postal mail, phone, or email to:

Chamberlain Group  
1/75 Epping Rd  
North Ryde, NSW, 2113  
privacy@chamberlain.com

- For individuals in the Middle East, contact us by postal mail, phone, or email to:

Chamberlain Group  
Attn: Compliance Department  
300 Windsor Drive,  
Oak Brook, IL 60523  
+1-833-620-0260

Ordinary Mail - Middle East:  
Chamberlain Group,  
PO Box 454495  
privacy@chamberlain.com

## REVISIONS TO THIS PRIVACY POLICY

CGI reserves the right, at its sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. If we do, we will make you aware of the change(s) on the Site or App by including a copy to the previous version of the Privacy Policy. The date this Privacy Policy was last revised is identified at the top of the page. Your continued use of the Site or App following the posting of changes to these terms means you accept these changes. If we change this Privacy Policy in a material way, we will provide appropriate notice to you.