

Tuya Privacy Policy

Effective as of: 2022-02-20

Scope

Tuya Global Inc., its affiliates and subsidiaries (“we”, “us”, “our”, “Tuya”) recognizes that your privacy is important and we take it seriously. This Privacy Policy describes how we collect, receive, use, store, share, transfer and process your information, as well as your rights in determining what we do with the information that we collect or hold about you when you access or use (a) our websites and online properties, including www.tuya.com and our career portal (collectively, the “Sites”), (b) our Cloud-based IoT Platform, including iot.tuya.com or developer.tuya.com and any dashboards or portals that we make available to our customers, users and others (collectively, the “IoT Platform”) and (c) the Tuya Smart Cloud. The Sites, the IoT Platform and any services we provide in connection with one or more of the foregoing are collectively referred to as the “Services.”

This Privacy Policy also covers our processing of information collected on behalf of and under the direction of our Clients through OEM branded Mobile Applications and Tuya APIs. The processing of such information is limited to the purpose of providing the service for which our Clients has engaged us and Tuya has no direct relationship with the individuals whose Personal Data it processes. If you are a customer of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly.

The Services may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control of or maintained by us. This

Privacy Policy does not apply to how third parties collect, use, disclose or retain information. We encourage you to review the privacy policies of these third-party websites or services.

If you have any questions or concerns regarding the data protection practices, please do not hesitate to contact:

Tuya Customer Service Department: dial 1-844-672-5646; email to service@tuya.com or ,

Tuya Privacy Office: privacy@tuya.com

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

Definitions

In this Privacy Policy,

Personal Data means, unless otherwise provided by applicable laws in your region of residence, information that can be used to identify a particular individual, either by that information alone, or in combination with other information.

User Data refers to the data submitted by users or collected by Tuya in order to provide its services, such as user name, contact information, etc., when user registers for an account on Tuya's website, interfaces with Tuya's products or services. For clarity, User Data includes, but is not limited to, Personal Data.

Smart Devices refers to those nonstandard computing devices produced or manufactured by hardware manufacturers, with human-machine interface and the ability to transmit data

that connect wirelessly to a network, including: smart home appliances, smart wearable devices, smart air cleaning devices, etc.

What Personal Data do We Collect

1. Information You Voluntarily Provide Us.

- **Account Data:** When you register an account with us, we may collect your name and contact details, such as your name, email address, mailing address, phone number, user name, and login credentials.
- **Transactional And Purchase/Payment Details:** If you purchase Tuya's Services, either online or offline, we may collect your records/dates of purchases, invoice information, billing address, payment method, or bank account, account holder information, and debit card numbers for the business partnership.
- **Session Data:** During your sessions of communications with our staff, such as consultations with our business team, or online interactions with the customer service team about our products or Services, we will collect your session records and relevant information, which is limited to the following: customized session ID, session time, your company name, as well as information you voluntarily provide. The purpose of such collection is to analyze your concerns raised during the session, so that we can enhance and improve our services and identify usage trends, or in order to address your problems. However, please be reminded that we will not collect any sensitive personal information related to your identity.
- **Name and Occupational Information in Communications with Us:** When you visit our websites, fill out our online forms, or engage with our support team, we may collect your

name and occupational information, such as your name, email address, and work/company information.

- **Job Application Information:** When you apply to work for us, we may collect your education and professional experience related information, such as school attended, course of study, academic degree obtained, grades, employment history, professional certification/licenses received.

2. Information We Collect Automatically.

When you use our Sites and Services, we may collect certain information, including Personal Data, about your use of the Sites and Services:

- **Device Information:** When you interact with our Sites and Services through hardware, we may automatically collect device information, such as the unique device ID number of your device, IP address, wireless connection information, operating system type and version, browser type and version, push notification identifier, and mobile network information.
- **Usage Data:** During your interaction with our Sites and Services, we may automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our Sites and Services.

The major purpose of collecting and using such data is to improve the products or services we provide to you, and to collect different volumes of data because of the different types functions of the products or services.

- **Log Data:** When you access or use our Sites and Services, any act you engage that may pose any risk to us will be recorded in form of log files. This may include without limitation,

system logs, exception logs, or logs describing how your operations may pose risk to us.

Logs may be uploaded to backend.

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

3. Information We Acquire from Third Parties

In some cases, and as permitted by law, we may obtain your Personal Data from a third party. For instance:

- You may authorize a third party to transmit data to us;
- We may obtain certain data from third–party partners, for instance, public information, including company name, company contact person, company email address, etc.;
- Data related to you provided by others, for example, when other users purchase products or services for you, they may provide us with your Personal Data, which may include your name, mailing address, and contact information.

Cookies and Similar Tracking Technologies

When you visit the Sites and Services, we and service providers on our behalf may send one or more “cookies,” which are small data files, to your devices to uniquely identify your browser and let us help you log in faster and enhance your navigation through the Sites.

Cookies help us measure, for example, the total number of visitors to our Sites, the number

of visitors to each page of our Sites, how our users use and interact with the Services, and the domain names of our visitors” Internet service providers. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. If you do not want cookies to be installed on your device, there is a simple procedure in most browsers that allows you to decline the use of cookies. Please be aware that some features of the Sites and Services will not function properly if the ability of your device to accept cookies is disabled.

We may also use web beacons to track usage patterns of users of the Services.

Additionally, we may use HTML-based emails sent to our users to track which emails are opened by recipients. The information is used to enable more accurate reporting and make the Services better for you.

We honor do-not-track signals or similar technologies that our systems detect and identify. We do not track, plant cookies, or use advertising when such do-not-track (DNT) browser mechanism is in place on your device.

Purpose and Legal Basis for Processing Personal Data

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

To Provide Our Services to You. We process your account data, device information, User Data, log data, location information(such as IP address), and Smart Device data in order to provide Services that you have requested or purchased. For example, you can connect the App and Smart Devices and control Smart Devices through Apps, and securely store your pictures and videos when purchasing cloud storage services. The legal basis for this processing is to perform our contract with you according to our [Terms of Use](#).

- **To Operate and Improve Our Services.** We process your device information, usage data, location information and Smart Device data to analyze trends and to track your usage of our Sites and Services as necessary to develop and improve our websites, and provide our users with more relevant and useful content. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

- **Account Management.** We process your Personal Data to create and manage accounts when you register with us. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

- **Handle Contact and Support Request.** We process your Personal Data to contact you to offer help based on diagnostic information about your Smart Devices, to fulfill your requests, respond to your inquiries and to provide support; Especially when you encounter usage problems when using Tuya products or services, please contact Tuya customer service team in time so that we can locate your problem more quickly and provide solutions. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

- **Marketing Communication.** We process your Personal Data to inform you about Services that we believe may be of interest to you. If we do so, each communication we send you will contain instructions permitting you to opt-out of receiving future communications of that nature. The legal basis for this processing is your consent.

- **Non-Marketing Communication:** We process your Personal Data to send you important information regarding the Services, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important, you may not

opt-out of receiving such communications. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

- **Research.** We process your Personal Data for our internal business purposes, such as data analysis, audits, developing new products or services, enhancing and improving the Services and identifying usage trends. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

- **Legal Compliance.** We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- comply with a legal obligation, process or request;
- enforce our Terms of Use and other agreements, policies, and standards, including investigation of any potential violation thereof;
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law; or
- detect, prevent or otherwise address security, fraud or technical issues.

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

Who do We Share Personal Data with?

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

- Sharing subject to your express consent: upon your express consent, we may transfer your User Information to third parties. For instance, if you have indicated that you wish to receive accurate push notifications and diversified services that we provide, we may share your Personal Data with certain third parties.

- To our third-party service providers who perform certain business-related functions for us, including:

- cloud service providers who provide Tuya with fundamental structural plans regarding cloud services, including network, server and virtual services, website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, e-mail delivery services, and other similar services to enable them to provide services to us;

- customer service providers who provide Tuya with customer support services, including customer service system support and personnel service support;

- enterprise authentication service providers who helps us with verification of enterprise accounts, contract signing and authentication of enterprise status;

- when place an order on Tuya's websites, we may share your information with third parties to allow you to receive our products and/or services that you order.

- To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices, and/or networks and systems through which you access and use our Sites and Services.

- To subsidiaries or affiliates within our corporate family for purpose of regular business activities based on our instructions and in compliance with applicable law, this Privacy Policy and other appropriate confidentiality and security measures.

- To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, and choices you may have regarding your Personal Data.

- As we believe in good faith that access to, or use, preservation, or disclosure of the information is reasonably necessary or appropriate to:

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

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

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

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

Data Transfer

Tuya operates globally, and Personal Data may be transferred, stored and processed outside of the country or region where it was initially collected. Also, the applicable laws in the countries and regions where we operate may differ from the laws applicable to your

country of residence. Under the Personal Data protection framework and in order to facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live.

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

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

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

Security

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data. Tuya provides various security strategies to effectively ensure data security of user and device. As for device access, Tuya proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization. As for data communication, communication using security algorithms and transmission encryption protocols and commercial level information

encryption transmission based on dynamic keys are supported. As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you could immediately notify us of the problem by emailing privacy@tuya.com in accordance with the section below.

Data Subject Rights

We respect your rights and control over your Personal Data. You may exercise any of the following rights by:

- a) Forward your privacy request through online communication by [clicking here](#) , or;
- b) Emailing us at privacy@tuya.com .

You do not have to pay a fee for executing your personal rights. According to different data protection laws, your request of personal rights will be handled within 15 business days, or within 30 calendar days due to different response requirement.

In your request, please make clear what information you would like to have changed, whether you would like to have your Personal Data deleted from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

You may:

- Request access to the Personal Data that we process about you;

- Request that we correct inaccurate or incomplete Personal Data about you;
- Request deletion of Personal Data about you;
- Request restrictions, temporarily or permanently, on our processing of some or all Personal Data about you;
- Request transfer of Personal Data to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated;
- Opt-out or object to our use of Personal Data about you where our use is based on your consent or our legitimate interests.

You may opt-out from receiving marketing-related emails through the email selection or other communications from us on a going-forward basis by emailing privacy@tuya.com.

We will comply with your opt-out request as soon as reasonably practicable. Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages. We partner with a third party to display advertising on our website or to manage our advertising on other sites. Our third-party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising click [here](#) or if located in the European Union click [here](#). Please note you will continue to receive generic ads.

Your California Privacy Rights

California Civil Code Section 1798.83 permits users of the Software that are California residents to request certain information regarding our disclosure of Personal Data to third

parties for their direct marketing purposes. To make such a request, please contact us in accordance with the “privacy@tuya.com” section below. We do not disclose Personal Data to third parties for their direct marketing purposes without your consent. Visit our Statement on [California Privacy Notice](#) page for more information.

Data Retention

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

1– For as long as you require us to fulfill the products and services you request from us as defined in the Terms of Use;

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

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

Children’s Privacy

Protecting the privacy of young children is especially important to us. The Services are not directed to individuals under the age of thirteen (13) (or such other age provided by applicable law in your country/region of residence), and we request that these individuals do not provide any Personal Data to us. We do not knowingly collect Personal Data from any child unless we first obtain permission from that child’s parent or legal guardian. If we

become aware that we have collected Personal Data from any child without permission from that child's parent or legal guardian, we will take steps to remove that information.

Changes to this Privacy Policy

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

Dispute Resolution

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Contact Us

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

Tuya Global Inc.

Postal Mailing Address: **3979 Freedom Circle, Suite 340, Santa Clara, CA 95054.**

Email to Tuya Privacy Office at: privacy@tuya.com.

For European Union or United Kingdom data subjects, you have the right to lodge a complaint with a supervisory authority concerning Tuya's data processing activities. For

questions, or to exercise your rights as an EU or UK data subject, please contact our

EU/UK Representative here:

Name: Rickert Rechtsanwaltsgesellschaft mbH

Email: art-27-rep-hangzhoutuya@rickert.law

Emailing Address: Colmantstraße 15, 53225 Bonn, Germany