

BLACK NOVA Privacy Policy

Last Updated: May 25, 2018

BLACK NOVA is committed to maintaining the privacy and security of your Personal Information.

This Privacy Policy describes information ATLAS AI Limited, EMT KONTROL ELEKTRONIK SAN TIC LTD STI, and its subsidiaries and affiliates (collectively, "BLACK NOVA") collect, use, share, and store, including personal information (i.e., information that personally identifies you, such as your name, email address or billing information, or other data that can be reasonably used to infer this information).

This document focuses on information related to the operation of BLACKNOVA devices, public websites (available at <https://blacknova.co>, <https://blacknova.ai>, together "Site" or "Sites"), and online applications (ex. NOVA Center) as well as any related product (hardware or software) that refers or links to this Privacy Policy.

Please note that this Privacy Policy applies regardless of whether you use a computer, mobile phone, tablet, TV, or other device to access the Sites or BLACK NOVA online applications. It is important that you read the Privacy Policy carefully because anytime you use the Platform, you consent to the practices we describe in the Privacy Policy. If you do not agree to the practices described in the Privacy Policy, you should not use the Platform or click on the "I Agree" button (if available).

COLLECTION AND USE

BLACK NOVA collects information about you through the Sites and online applications in several ways. This information is used to provide users with BLACK NOVA products and services, to allow us to understand how visitors navigate our Site, and to provide advertising that is relevant to your interests.

We may also seek your consent to collection of information not described in the Privacy Policy.

Mailing List Information:

You may choose to submit your email address via a submission form located on our Site or when you sign up for a BLACK NOVA account. Your email address may be used to

send you news about BLACK NOVA-related services, surveys, products or promotions. We may use one or more service providers, including to administer these messages, but we do not share your email address with spammers or any other third parties without your permission.

Device Usage information:

If you visit our Site and are logged into your BLACK NOVA account, we record the IP address you visit our Site from, and if you have a BLACK NOVA device or other connected device, we record adjustments you make to the product through the website interface. We store this data along with your email address, information about your BLACK NOVA device, data collected directly by the device, a history of your device settings, and any other information we have collected about your use of BLACK NOVA products and services.

Website Use Information:

Like many websites, we and our third-party partners analyze log file information and other data collected through cookies, web beacons, and other tracking technology, to collect information about your browsing behavior when you visit our Site, including for example, your browser type, domains, page views, IP address, referring/exit pages, information about how you interact with our Site's web pages and with third-party links, traffic and usage trends on the service, etc. We use session cookies to keep you logged in while you use features of our Site; these disappear after you close your browser. We also use persistent cookies, which stay in your browser and allow us to recognize you when you return to the Site. We use this to remember your information so you will not have to re-enter it, to better understand how you use our website and products and services, to diagnose and fix technology problems, and otherwise enhance our Site, products, and services. In some of our email messages, we use a "click-through URL" linked to content on the Site. We track this click-through data to help us measure the effectiveness of our customer communications. We also use third-party analytics tools (including Google Analytics) to assist us with analyzing and improving our service. Most Internet browsers automatically accept cookies, but you may be able to change the settings of your browser to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you set your browser to reject cookies, parts of our Site may not work for you. Please note, depending on your type of device or browser, it may not be possible to delete or disable all tracking mechanisms on your device.

Your selection of the "Do Not Track" option provided by your browser may not have any effect on our collection of cookie information for analytic and internal purposes. The only way to completely "opt out" of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device to delete and disable cookies and other tracking/recording tools.

We permit third-party advertising partners to use cookies and other technology to collect information about your browsing activities over time and across different websites when you use our Site. For example, we may use advertising services provided by third-party ad partners, such as Google Display Network and AdRoll, to market our services to you on other websites and online services. Through a process called "retargeting," each service places a cookie on your browser when you visit our Site so that they can identify you and

serve you ads on other sites around the web based on your browsing activity. To avoid use of this information for advertising by these third-party ad partners, you can change your browser settings to reject cookies or to notify you when cookies are set and you could select the Do Not Track option on your browser, though we have no control over and cannot confirm whether these third-party ad parties honor the Do Not Track browser signal. Additionally, many advertising companies are members of the NAI or DAA and/or provide opt-outs on those industry pages at networkadvertising.org/choices or aboutads.info/choices.

Third-Party Sites and Features:

Our Site may contain links to other websites operated by third parties and may include social media features such as Facebook and Twitter buttons (such as “Like,” “Tweet” or “Pin”). These third-party sites may collect information about you if you click on a link and the social media sites may automatically record information about your browsing behavior every time you visit a site that has a social media button. Your interactions with these features are governed by the privacy policy of the company providing the feature, not by our privacy policy. We do not control what information these third parties collect. Please review your privacy settings on your social media sites and think carefully before clicking on links which may take you to a third-party website.

Minors:

Our Site does not knowingly collect or store any personal information about children under the age of 13.

DATA SHARING

Under no circumstance do we share personal information for any commercial or marketing purpose unrelated to the delivery of BLACK NOVA Products and services without asking you first. We do not rent or sell our customer lists.

The following are the limited situations where we may share personal information:

With your permission:

We may share personal information when we have your permission. One example of this would be if you sign up for programs offered by our partners. If you do this, we may share certain information with the partner. This could include things like your enrollment information and the activation status of your device. BLACK NOVA will request your consent to these exchanges on your behalf and you can change your mind at any time. When you use third-party services integrated with the BLACK NOVA Products, their own terms and privacy policies will govern those services.

For external processing:

We have vendors, service providers, and technicians who help with some of our processing and storage, including helping to answer your questions. They may also assist with monitoring our servers for technical problems.□ These technicians (as well as BLACK

NOVA employees) can access certain information about you or your account in line with this work but these technicians are not allowed to use this data for non-BLACK NOVA purposes. We also have strict policies and technical barriers in place to prevent unauthorized employee access to video data.

As part of business transitions: Upon the sale or transfer of the company and/or all or part of its assets, your personal information may be among the items sold or transferred. We will request a purchaser to treat our data under the privacy statement in place at the time of its collection.

For legal reasons:

We may provide information to a third party if we believe in good faith that we are required to do so for legal reasons.

We may share non-personal information (for example, aggregated or anonymized customer data) publicly and with our partners. For example, we may publish trends about energy use. This information may also be shared with other users to help them better understand their energy usage compared to others in the BLACK NOVA community, raise awareness about safety issues, or help us generally improve our system. We may also share non-personal information with our partners, for example, if they are interested in providing demand-response services or other incentive programs. We take steps to keep this non-personal information from being associated with you and we require our partners to do the same.

Your personal information may be collected, processed and stored by BLACK NOVA in the countries outside the European Union where our servers reside. As a result, your personal information may be subject to legal requirements, including lawful requirements to disclose personal information to government authorities, in those jurisdictions.

SECURITY

BLACK NOVA takes security seriously and cares about the integrity of your personal information. We use commercially reasonable physical, administrative, and technological methods to transmit and store your data securely. However, BLACK NOVA cannot guarantee that unauthorized third parties will never be able to defeat our security measures or use your personal information for improper purposes. In the event that any information under our control is compromised as a result of a breach of security, we will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

RETENTION

BLACK NOVA generally stores your personal information on BLACK NOVA's servers until you delete or edit it, or for as long as you remain a BLACK NOVA customer in order to provide you with BLACK NOVA Products. In addition, BLACK NOVA may store your personal

information to resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements and comply with applicable laws.

We may share, as described in this Privacy Policy, information with our affiliates and subsidiaries, and third parties. We may disclose information in response to legal process and lawful requests by public authorities for the purposes of law enforcement and national security.

Individual Rights in the European Economic Area: If you are located in the European Economic Area, you may seek confirmation regarding whether BLACK NOVA is processing personal information about you, request access to your personal information, and ask that we correct, amend or delete your personal information. In addition, you may object to BLACK NOVA's processing of your personal information at any time. However doing so may impact your use of the BLACK NOVA Products and Services.

Applicable law may provide you with the right to request access to, (receive) port, object to or restrict processing, seek rectification or request erasure of personal information held about you by BLACK NOVA. To protect your privacy, BLACK NOVA will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal information.

POLICY UPDATES

It is important that you check back often for updates to the Privacy Policy. This Privacy Policy may be revised from time to time as we add new features and services, as laws change, and as industry privacy and security best practices evolve. If we update the Privacy Policy, we will let you know about our changes we consider material by placing a note on the relevant web page you use to access the BLACK NOVA services. By accessing or using the Platform after we have placed such a notice, you consent to the new practice(s) identified in the update.

CONTACT

If you have any questions or requests about your personal data, please contact us at support@blacknova.co