



# Digital Products for Private Users

## - Privacy Notice

**We commit to serve you, our customers, with care, consideration, and respect and to protect your privacy and personal information.**

The [Data Privacy Policy](#) of Schneider Electric explains how and why we use personal information. This supplemental notice provides additional information about Digital Products for Professional and Private Users.

### 1. What is the scope of this privacy notice?

This privacy notice applies to digital products for private users (“the service”) by Feller AG, an affiliate of Schneider Electric (“we”). The statements here, together with those in our [Data Privacy Policy](#) explain what personal information will be collected through your use of the service, how the information will be used and how you can control the collection, correction and/or deletion of information.

“the service” considers the following:

- Feller account management for private users: Login for the digital tools provided to private users
- Wiser by Feller System: A smart home system, which after installation of the devices must be commissioned by the professional user via eSetup App and can then be controlled via the Home App by the private user either locally or remotely.

### 2. Who is in charge of data processing?

The processing of personal information is carried out by Feller AG, an affiliate of Schneider Electric (“we”) as data controller.

As a global company, we commit to ensure an adequate level of protection for personal information in compliance with applicable laws. We have adopted internal policies which impose common rules for the collection, use and disclosure of personal information by all entities globally. To know more, please read our [Data Privacy Policy](#).

### 3. What types of personal information do we process?

The data processed are listed for “the service” offered to you.

### 3.1 Feller account management

In order to create a feller account for a private user, you need to have a Wiser by Feller system. You can access and manage your data, which you provided during the login process in the feller account management system directly.

We process and store the following categories of personal information:

Categories of personal information	Source:	Purposes for processing
Contact information <u>Information that you provide</u> to register and manage your profile in the Feller account management system: <ul style="list-style-type: none"><li>• First name, Surname</li><li>• Email and password (login data)</li></ul>	you	To manage the account and to provide the service and support. For contract management and to communicate with you. This is to perform the contract with you, either as an individual user or as a legal person, in which case the contract performance is in our respective legitimate interest.  For our business purposes. To ensure the security of products, services & digital content, the security of our activities and of others. This is based on our legitimate interest, provided that such processing shall not outweigh your rights and freedoms. We will also ask for your consent as required by laws, including regulations applicable to cookies and similar technologies.

### 3.2 Wiser by Feller System (based on installed devices)

When using Wiser by Feller with your wiser home app, you are in control of your personal information, which remains almost exclusively within your gateway in your own home. However, when you choose to connect the service to the Internet, we process a limited amount of personal information to be able to deliver the connected experience to you, for instance remote access.

We encourage you to let all home occupants know about the installation and operation of the service and to show them this Privacy Notice.

We process and store the following categories of personal information:

Categories of personal information	Source	Purposes for processing
Contact information	you	Refer to table in "3.1 Feller account management"
Identifiers	you	We store these items for functional reasons and to provide the service.

<p><u>Information that you provide</u> to connect your smart home “Wiser by Feller”</p> <ul style="list-style-type: none"> <li>• identifier of your gateway.</li> <li>• Your home network information (SSID)</li> </ul>		
<p>Installation information</p> <p><u>Information that you may provide (optional)</u> to control your smart home “Wiser by Feller” locally</p> <ul style="list-style-type: none"> <li>• You may give personalized names to rooms and to loads.</li> <li>• You may set settings or perform commands like switch on a device or to create scenes</li> </ul>	you	To manage the account and to provide the service and support. For contract management and to communicate with you. This is to perform the contract with you. These are stored in your gateway for functional reasons, but we do not access them.
<p>Scene Information</p> <p><u>Information that you provide</u> to control your smart home “Wiser by Feller” remotely (triggering a scene):</p> <ul style="list-style-type: none"> <li>• Scene identifier</li> </ul>	You & then smart home device	<p>For functional reasons an identifier for a scene will transit through our systems when you trigger a scene remotely.</p> <p>However, the actual description of the scene is only stored in the mobile application and in the home gateway. Therefore, the actions you wish to trigger will not be visible to us.</p>
<p>Device Information</p> <p><u>Information read or measured</u> by the installation over the bus</p> <ul style="list-style-type: none"> <li>• Information from devices, which can report their status or other variables. For example: on/off status of a light, or up/down status of a blind.</li> <li>• Events related to your devices. For example: if you have connected your</li> </ul>	smart home devices	For functional reasons and to provide you the service and support, the smart home the devices report their status, other variable and events.

gateway, the last day and time it was seen online, its firmware version		
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### 3.3 Partner services.

No partner service receives any personal data.

## 4. Why do we collect and use personal information?

- To deliver our services and to provide support
- For communication, security and other purposes indicated in our Data Privacy Policy

We do not make decisions based solely on automated processing which may produce legal effects or similarly affect you.

### 4.1 Operation

We use personal information for the purposes of delivering our services and providing support to users. This is to perform the contract with you, either as an individual user or as a legal person, in which case the contract performance is in our respective legitimate interest.

### 4.2. Communications, security, and other purposes

We use personal information for relationship management (including contract management) and to communicate with you. We also process information to ensure the security of products, services, digital content, and the security of our activities and of others. We may also need to address complaints. Other purposes are found in our Data Privacy Policy.

Depending on the circumstances, these activities may be based on the execution of a contract with you, on our legitimate interest, on the legitimate interest of a third party, or for compliance with a legal obligation. We will also ask for your consent as required by laws, including regulations applicable to cookies and similar technologies.

## 5. How long do we keep your personal information?

We keep information as needed to perform the purposes described above, taking into consideration the need to provide the services, marketing requirements, security requirements, legal requirements, and statute of limitations.

To request deletion of your account, see Section “How to exercise your choices and rights about your personal information”

- For marketing purposes, we keep relevant customer information for three years after the end of our relationship or since the last interaction with us.
- Ultimate deletion of your information may be temporarily delayed to give you an opportunity to undo a mistake, to comply with legal requirements and statute of limitations.
- In case of installed devices:

- Most information is only stored in the gateway, where you are in control of the retention periods. This means that you can choose to delete scenes and loads according to your needs. Please ask an installer if support is required.
- The current state of lights and loads (on/off) and of blinds (up/down) is stored in your gateway, which does not store any history of their previous state.

## 6. Who do we share personal information with and where is it processed?

We do not sell your personal information.

Personal information will be processed by our affiliates and suppliers involved in the provision of the services and in the performance of the purposes. Their activities include hosting and maintenance, performance monitoring and security. As we are a global company, teams and suppliers may have global or multi-country roles, and they can be located anywhere in the world, in countries with different privacy standards than the country of our customers. We take measures to ensure that personal information receives an adequate level of protection. We have internal policies applied by our affiliates and we conclude relevant contracts with our suppliers to ensure appropriate safeguards. Our group has adopted Binding Corporate Rules (BCR). In addition, we conclude Standard Contractual Clauses and rely on EU Commission's adequacy decisions as well as the list of states from the Swiss EDÖB. To obtain more details and copies of safeguards put into place, you may contact [global-data-privacy@schneider-electric.com](mailto:global-data-privacy@schneider-electric.com).

We may also share your information, as necessary:

- with competent authorities, based on a good faith belief that disclosure is necessary to respond to a judicial process, a valid official inquiry, or if otherwise required by law;
- to defend our legal rights, or to protect the rights or safety of any person or entity;
- as instructed by you, our customer, or the user.
- with third parties in the context of reorganization of operations.

If you authorize third parties to collect information from connected devices, to access information processed within the service, or to issue commands to connected devices (for instance using a third-party voice assistant), we will also share information with these third parties in order to perform your requests. We do not control these third parties or their privacy practices. You should review their privacy policies before engaging with them.

### Google Analytics

The service includes Google Analytics, a Google service which provides us with information about how you use the mobile and the web applications. Google publishes information about its use of information at <https://www.google.com/policies/technologies/partner-sites>

Google Analytics features are used to understand how often functionalities are used.

## App Center

App Center is an integrated developer services for building, testing, sharing, and monitoring mobile and desktop app by Microsoft. The service includes Diagnostics such as Crashes and analytics for mobile applications.

## 7. How do we secure personal information?

We follow generally accepted industry standards to protect personal information and we maintain appropriate administrative, technical and physical safeguards to protect it against accidental or unlawful destruction, accidental loss and unauthorized alteration.

However, no method of transmission over the internet or of electronic storage is 100% secure. Therefore, we cannot guarantee absolute security.

## 8. How to exercise your choices and rights about your personal information?

In order to exercise the data protection rights granted under applicable data protection law (Swiss-DSG/EU-DSGVO), such as the rights to be informed, to access, to rectify, to withdraw consent, to request erasure or restriction, the right to object and data portability, you may:

- access and edit your personal information and exercise your choices, using the Feller account management.
- request deletion of your account by using the Feller account management; beside deleting your account data we ensure we can't trace back any information associated with your setup (identifier of your gateway).
- In case of installed devices: Remove a device from your setup. (please ask your installer if support is required);
- make a request at [datenschutz.schneider-electric@uimc.at](mailto:datenschutz.schneider-electric@uimc.at). To ensure the security of your personal information, we may ask you to provide other details to verify your identity.

For any suggestion, question, and request, you may contact us as set forth in the "How to Contact Us" section. We will be happy to assist you.

## 9. How to contact us?

You may address questions or comments about our privacy practices or this privacy notice to the correspondent for Switzerland of our Data Protection Officer (DPO):

[datenschutz.schneider-electric@uimc.at](mailto:datenschutz.schneider-electric@uimc.at)

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Schermenwaldstrasse 11

3063 Ittigen

Switzerland

Feller AG  
Bergstrasse 70  
8810 Horgen  
[marcom@feller.ch](mailto:marcom@feller.ch)

If you believe that Schneider Electric has processed your personal information in violation of applicable law, you may file a complaint with the DPO at the contact details above or with a supervisory authority.

## 10. Changes to this privacy notice

Please note that this privacy notice may change from time to time. We will provide information about material changes.

Last updated: December 2021