

Effective Date: 12-10-2021

**PRIVACY STATEMENT/YOUR PRIVACY RIGHTS –
SMART BREAKERS, EV SMART BREAKER CHARGERS, AND
ASSOCIATED MOBILE APPLICATIONS**

Eaton Corporation (“Eaton,” “us,” “we,” or “our”) owns and operates the SMART BREAKERS, EM INSTALL APPLICATION, SMART ENERGY MANAGER APPLICATION, and the EV DRIVER APPLICATION (“Product(s)”) and any related Service, including mobile applications, websites, products and services related to the Product (collectively, the “Services”). Eaton, as the data controller, is committed to protecting the privacy of those who use the Product and/or the Services. This Privacy Statement (“Statement”) contains details about how Eaton collects, uses, and shares with third parties Personal Data (defined below) that we obtain from and about you when interacting with Eaton and the Services. Please read this Statement carefully. If you not agree with our policies and practices, do not download, install or operate the Services, do not access or use the Product, and do not interact with any other part of the Services.

Applicability: This Statement covers only the Product and Services identified above and does not apply to information that you may send us by other means or related to other Eaton products or services. Other Eaton sites, applications and online services or locations may have their own privacy statements, and you should consult those accordingly. This Statement also does not apply to job applicants or Eaton employees.

Whenever you interact with Eaton or the Product and Services on behalf of another individual or entity, such as by providing or accessing Personal Data about another individual, you represent that you have the authority to do so. You shall have sole responsibility for any violation of privacy laws as a result of a failure to obtain any necessary consent from such individual/entity.

Changes: Eaton may update this Statement from time to time. The current Statement will be posted at the bottom of the home page for the Services and will be effective when posted. Please check this Statement periodically for updates. If any of the changes are unacceptable to you, you should cease using the Services. When required, we will notify you of any changes to this Statement. If any changes to this Statement materially affect how Eaton treats or handles Personal Data that you have already provided to Eaton or that has otherwise been collected by us, or when required under applicable laws, we will seek affirmative consent from you, by email (if we have a valid email address to use), to use it in the new manner. If you do not provide such consent, Personal Data will continue to be used in a manner that is consistent with the version of this Statement under which it was collected, or the information will be deleted.

What Information Do We Collect?

Personal Data (“Personal Data”) is any information relating to an identified or identifiable natural person (“Data Subject”).

Sources of Personal Data:

We collect information about you and how you use the Services in several ways, including:

- **Information you provide to us directly.** We collect the information you provide to us directly, such as when registering with the Services, signing up for offers, or communicating with us.
- **Information collected or inferred from your use of the Services.** We collect information about the Services and how you use them, such as information collected automatically when you visit or use our Site, download a mobile application, or otherwise interact with the Services.
- **Information from third parties.** We receive information about you and your use of the Services from third parties, such as from your employer or coworkers, third party service and content providers, companies that provide or sell lists of potential purchasers, and other Services users.

We may combine information that we receive from the various sources described in this Privacy Statement, including third party sources, with Personal Data and use or disclose it for the purposes identified below.

Information We Collect:

The types of information that Eaton collects about you include:

- **Contact and account information**, such as your name, postal address, email address, phone number, user name and password
- **Financial information**, such as your credit/debit card number or bank account number
- **Technical information gathered when you interact with the Services**, such as IP address, browser information, ICCID, device type, app and OS version
- **Internet or other electronic network activity information**, such as your browsing history, search history, and information regarding your interactions with and use of the Services (including the Site, mobile application, and advertisements)
- **Employment information**, such as job title, employment history, or other professional information
- **Commercial information and preferences**, including electricity access and usage
- **Geolocation data**
- **Inferences** drawn from any of the information we collect to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes

How Do We Use Your Personal Data?

We may use your information in a number of ways, including:

- **To provide you with the Services**, such as to register and administer your account, provide Services you may request; support your Services; diagnose, repair and track service and quality issues; communicate with you about your Services; install and configure changes and updates to your Services; authenticate users of our Services; verify your eligibility for certain programs or benefits; or to respond to your requests, complaints, and inquiries.
- **For our own internal business purposes**, such as to evaluate or audit the usage, performance and safety of our Services; evaluate and improve the quality of our Services and design new services; operate the Product and Services and customize the content; internal research purposes; display or evaluate the effectiveness of our advertising or marketing efforts; or maintain internal business records.
- **For legal, safety or security reasons**, such as to comply with legal requirements; protect the safety, property or rights of Eaton, Services users, or others; and detect,

prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity.

- **For marketing.** We may use your Personal Data to market our products or services or those of third parties. When required by law, we will seek your consent for such marketing.
- **In an anonymous or aggregated format.** We may also use your information in an anonymized or aggregate manner for any purpose.

With Whom Do We Share Your Information?

We may share your Personal Data with entities other than the Eaton entity that originally collected it, including the categories of recipients described below:

- **Affiliates and subsidiaries:** We may share your Personal Data within the Eaton group of companies, which includes parents, corporate affiliates, subsidiaries, business units and other companies that share common ownership for the purposes described above.
- **Third party service providers:** We may share your Personal Data with third party service providers working on behalf of Eaton in order to provide the Services you request or support our relationship with you, such as IT providers, accountants, analytics companies, and marketing providers.
- **For legal, security and safety purposes:** We may share your Personal Data with third parties such as law enforcement or other government agencies to comply with law or legal requirements; to enforce or apply our Terms of Use and other agreements; and to protect our rights and the property or safety of Eaton, our users, or third parties.
- **In connection with a transaction:** If we, or some or all of our assets, are acquired by another entity, including through a sale in connection with bankruptcy, we will share your Personal Data with that entity.
- **Your employer or coworkers:** If you receive the Services in connection with your employment, your employer, coworkers, or other individuals designated by your employer may view any Personal Data that we collect in connection with your use of or interaction with the Services.
- **Third parties for their own purposes:** We may sell your Personal Data to third parties for their own marketing, research, or analytics purposes.

We may also share Personal Information that has been anonymized or aggregated with third parties for any purpose.

Cookies and Other Tracking Technologies

Please click [here](#) for information about how we use cookies and other tracking technologies, including online behavioral advertising.

Data Security and Retention

Eaton maintains reasonable security procedures and technical and organizational measures to protect your Personal Data against accidental or unlawful destruction, loss, disclosure or use of personal data we handle. When handling your Personal Data for our business functions, Eaton will limit access to your Personal Data to authorized persons and trusted third parties who have a reasonable need to know the information in order to perform our Services who are bound by confidentiality obligations. While Eaton takes the issue of protecting your Personal Data seriously, you should exercise discretion in what information you disclose and/or transmit through the Services. Eaton cannot guarantee that information sent over the Internet is fully

secure, and therefore the transmitted information may be intercepted by others before it reaches Eaton. Eaton is not responsible for the security of information sent over the Internet.

Eaton retains Personal Data only for as long as necessary to fulfill the stated purpose for which the Personal Data was collected or otherwise processed, and thereafter only for legitimate legal or business purposes. These may include retention periods that are: (i) mandated by law, contract or similar obligations applicable to Eaton's business operations; (ii) for preserving, resolving, defending or enforcing our legal/contractual rights; or (iii) needed to maintain adequate and accurate business and financial records. We will delete Personal Data as soon as the respective purpose for its use is complete and no legal obligation to retain such data exists.

Children's Privacy

The Services are intended for individuals 18 years of age and older. The Services are not directed at, marketed to, nor intended for, children under 18 years of age. Eaton does not knowingly collect any information, including Personal Data, from children under 18 years of age. If you believe that we have inadvertently collected Personal Data from a child under the age of 18, please contact us at the address below and we will take immediate steps to delete the information.

External Links

The Services may contain links to external sites or other online services, including those embedded in third party advertisements or sponsor information, that are not controlled by Eaton. Eaton is not responsible for the privacy practices and data collection policies for such third party services. You should consult the privacy statements of those third party services for details.

Terms of Use

The Terms of Use/Legal Notice/End-User License Agreement for the Services is incorporated by reference into this Statement, and can be found at: www.eaton.com/emcb

Contact Info/Your Choices

If you have questions regarding this Statement, please contact Eaton at:

Eaton
Attention: Global Data Protection and Privacy Office
1000 Eaton Boulevard
Cleveland, Ohio 44122
dataprotection@eaton.com

To opt-out of receiving promotional email messages from us, please click on the "Unsubscribe" link contained at the bottom of each email or by contacting us using the information above.

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How We Use Cookies and Automatic Data Collection Tools

When you visit an Eaton Site, open an e-mail marketing communication or download an Eaton mobile application, we or our third-party service provider may collect information through the use of a "cookie" or other device recognition technology. These tools send a small file to your browser that is unique to you and can only be read by our or our third-party service providers' web servers. These files provide information that helps us customize your experience on our websites and provide relevant advertising to you.

Types of Cookies We Use

We or our third-party service providers may use cookies to collect information about your and other visitor's browsing behavior such as IP address, type of browser used, domain name and pages visited. This information is used to learn about the usage and effectiveness of our web properties in order to improve how our EMCB works and for advertising purposes. These cookies are session and persistent cookies. Some cookies may be used to track you across devices.

Specifically, Eaton's policy on cookies is as follows: <https://www.eaton.com/us/en-us/company/policies-and-statements/privacy-cookies-and-data-protection/cookies.html>

Changing Cookie Preferences

Most browsers are set to accept cookies. Using the "help" feature on your browser (e.g., Google; Microsoft; Apple; Mozilla), you can manage your browser cookie preferences to, for example, automatically accept cookies, automatically decline cookies, or notify you before receiving a cookie.

You can find more information about cookies generally at: www.allaboutcookies.org.

If you use our websites and choose not to disable cookies, you agree that we or our service provider can place them on your device. Please note that refusing a cookie may affect your ability to access certain content or functionality offered by our website. We do not process or honor other "Do Not Track" signals.

Online Advertising

Eaton advertises on the websites of third parties. These third parties may use cookies or tools to gather information about your browsing activities in order to provide advertising relevant to your interests.

You can manage your receipt of targeted advertising by visiting these websites: in the EU, <https://www.youronlinechoices.eu/> and for U.S. and other regions, <http://www.aboutads.info/consumers>.

Marketing Communications

We provide digital marketing communications about our Services with an unsubscribe mechanism in each communication. You can unsubscribe from any particular communication by clicking on "unsubscribe" in the email itself.

Notice to California Residents

This section applies to California Residents.

As described in the *'What Information Do We Collect?'* we might collect personal information including identifiers, commercial information, internet or other network activity information, geolocation information, professional or employment-related information and inferences drawn from any of the information identified above to create a profile about a consumer.

As described in ‘*With Whom Do We Share Your Information?*’ section, personal information we collect from consumers might be shared for business purposes with third parties. We might have disclosed all of the categories of personal information listed above, based on the use case, for a business purpose in the past 12 months.

We do not sell your personal information.

As a California resident you have certain rights, subject to legal limitations and applicable exceptions, regarding the collection, use, and sharing of your personal information. Those right are in particular:

- **The right to know.** You have the right to request information about the categories of personal information we have collected about you, the categories of sources from which we collected the personal information, the purposes for collecting the personal information, the categories of third parties with whom we have shared your personal information, and the purpose for which we shared your personal information (“Categories Report”). You may also request information about the specific pieces of personal information we have collected about you (“Specific Pieces Report”). Please specify which request you want to execute.
- **The right to delete.** You have the right to request that we delete personal information that we have collected from you.
- **The right to opt-out.** You have the right to opt out of the sale of your personal information.

In accordance with applicable law, we will not discriminate against you for exercising these rights. You may use an authorized agent to exercise your rights on your behalf. If you are making any of the requests above through an authorized agent, we will request written authorization from you and will seek to verify as described above or we will accept a legal Power of Attorney under the California Probate Code to the authorized agent.

You can execute your right at any time by contacting us by sending an email to dataprotection@eaton.com, by calling +1-800-386-1911 or by using this [online form](#).

In order to exercise your rights, we will need to obtain information to locate you in our records or verify your identity depending on the nature of the request. If you are submitting a request on behalf of a household, we will need to verify each member of the household in the manner set forth in this section. Therefore, based on the request we might reach out to you for further information.

We will respond to a Request to Opt-Out within 15 days. We will respond to Requests to Delete and Requests to Know within 45 days, unless we need more time in which case, we will notify you and may take up to 90 days total to respond to your request.

This Statement was last updated on December 10, 2021.