

Xiaomi Privacy Policy for the "Xiaomi Planet" App

1. Who is responsible of protecting your personal data?

In accordance with art. 13 of EU Regulation no. 679/2016 ("GDPR"), we wish to inform you that the personal data of users ("Users") of the "Xiaomi Planet" App ("App") will be processed by Xiaomi Technology Italy S.r.l., with registered office in via Meravigli 12-14, 20123, Milan (MI) ("Xiaomi") for the sole purpose of providing the App and the services offered within it.

To the extent that Xiaomi is responsible for protecting the personal data provided by Users, Xiaomi is referred to in this privacy policy as the "Data Controller".

2. Who you can contact in relation to your personal data?

Xiaomi has appointed a data protection officer ("DPO") to help to ensure an adequate protection of Users' personal data.

The DPO can be reached at the following e-mail address: privacy@xiaomi.com.

3. What types of personal data Xiaomi processes?

Xiaomi collects and uses the following personal data:

- Personal contact details (name, surname, e-mail address, generic geographic address);
- User profile data (name, IP address, login ID, nickname, username, password and/or security question and answer and other registration information);
- Data generated during the use of the service (e.g. messages and interactions with the customer service, nicknames and personal data during the use of the discussion forum);
- Data contained in log files (information relating to the use of certain functions of the App by the User);
- ~~Other data concerning the use of the App by the User in a totally anonymous form.~~

In any case, respecting the principle of necessity and proportionality, Xiaomi will undertake to collect and use only the data strictly necessary to achieve the purposes of the processing.

4. For what purposes does Xiaomi process your personal data and for how long?

Users' personal data explained in the previous point are collected and processed by Xiaomi for the following purposes:

- a) Provide users with training activities, including the allocation of points and badges to Users for rewarding activities, sending awards to Users, as well as manage possible participation in dedicated forums and challenge between users. Personal data for this purpose is processed by Xiaomi for the provision of training activities to relevant personnel. Please note that failure to provide the data requested by Xiaomi makes it impossible to access and use the services and activities offered through the App. Xiaomi will stop processing personal data for this purpose once the User deletes his account.
- b) Checking the performance of the App. Personal data for this purpose is processed by Xiaomi based on its legitimate interest to provide the best experience to Users. For this purpose Xiaomi processes personal data directly provided by Users and, where Users have provided their consent to cookies, personal data obtained through cookies in accordance with our [Cookies Policy](#). Xiaomi needs to process this personal data for an adequate provision of the services through the App. Users can choose not to provide data through cookies as explained in the Cookies Policy. Please consult our DPO in the email address provided in section 2 for more information on why Xiaomi needs to process this personal data and how to limit this processing. Xiaomi will stop processing personal data for this purpose after three years since the date it was collected.
- c) Sending push notifications via App to inform about relevant information regarding training activities. For this purpose Xiaomi processes personal data directly provided by Users and, where Users have provided their consent to cookies, personal data obtained through cookies in accordance with our [Cookies Policy](#). The only cookie used is a Technical Cookies. Technical Cookies, essential for the correct functioning of the website and to provide the service offered and requested by a user. Users can choose not to receive push notifications directly through the App settings. Xiaomi will stop processing personal data for this purpose from the moment the User chooses not to receive push notifications.
- d) For the purposes described in our [Cookies Policy](#).

5. Who do we share your personal data with?

Xiaomi shares Users' data with suppliers, collaborators and/or third party consultants of Xiaomi, who work under the supervision of Xiaomi and who follow the instructions provided by Xiaomi, particularly in what refers to the processing of your personal data.

For the complete list of these providers, the User may send a request to the email address provided in section 2.

The User's data may also be disclosed for law enforcement and other legal purposes. The sharing of data, in particular, may take place in connection with a legal proceeding, a claim for compensation,

in the case of investigations, orders and injunctions, for the exercise of rights, for security reasons or similar.

In accordance with the law, Xiaomi may share (or receive) Users' data in case of acquisition, merger, assignment, reorganization proceedings, insolvency proceedings, including bankruptcy proceedings, or other similar events involving Xiaomi. Xiaomi will take the necessary measures to ensure that the data is managed and processed in accordance with this privacy policy and with the GDPR.

6. Does Xiaomi send your personal data outside the European Union?

Your personal data will not be disseminated or communicated/transferred to countries outside the European Union. The management and storage of personal data will take place on servers located within the European Union. Xiaomi will promptly inform Users whether this situation changes.

7. What rights do you have in relation to the processing of your personal data?

The User may exercise the rights under Articles 15 to 22 GDPR, by writing our DPO to the e-mail address: privacy@xiaomi.com. This request will be answered without delay.

In particular, the User has the right to:

- access his personal data, obtain information about its processing, as well as to obtain a copy of the personal data processed.
- Rectify inaccurate and incomplete data.
- Erase his personal data, in the cases provided for by Art. 17 GDPR.
- Obtain the limitation of the processing in the cases provided for by Art. 18 GDPR.
- Receive from the Data Controller their personal data in a structured format, in common use and readable by automatic device and transmit them to another data controller (so-called portability).
- Object to the processing of personal data concerning him/her carried out by automated means, including profiling, in the cases provided for by Art. 21 GDPR.
- Send a complaint to a public authority in relation to the processing of personal data by Xiaomi. Please contact our DPO through the email address provided for above to know which public authority would be able to help you.

8. What security measures does Xiaomi have in place?

In order to prevent unauthorized access, disclosure or other similar risks and to secure data collected on the User's mobile device and/or App in accordance with applicable laws, Xiaomi adopts all physical, electronic and management procedures required by law.

All the User's personal data is stored on secure servers located in controlled facilities. Xiaomi classifies the User's data according to criteria such as importance and sensitivity and ensures that such data is given the necessary and required level of security. Xiaomi also has special controls for access to the cloud-based data storage system and regularly reviews its data collection, storage and processing practices, including physical security measures, to prevent any unauthorized access and/or use.

Xiaomi also conducts, with due diligence, investigations with respect to its business partners and third party service providers in order to ensure that they have adequate measures in place to protect the User's personal data. Xiaomi also verifies that such third parties maintain appropriate security standards, applying appropriate contractual restrictions and, where necessary, performing checks and evaluations. Please also note that Xiaomi's employees and those of its business partners, as well as third party service providers who access the User's personal data, are subject to contractual obligations of confidentiality.

Xiaomi prepares tests and holds training courses on security measures and obligations deriving from GDPR and Privacy Policy, in order to ensure that its employees are aware of the importance of personal data protection. However, it should be noted that Xiaomi cannot guarantee the full security or integrity of any personal data when it is transferred from the User or to the User via the Internet.

Finally, Xiaomi handles violations of personal data in accordance with applicable law, notifying the competent authorities and the parties involved in the processing of the data.