PRIVACY POLICY

Zaluti Smart Control App

Last updated 6 November 2026 **Data controller** Zaluti B.V., Breda, The Netherlands

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Article 1 Introduction and Data Controller

Thank you for using the Zaluti Smart Control App (hereinafter referred to as the "App"). Protecting your personal data is very important to us. Below, we inform you in detail about what data is collected when you use our App and how it is processed.

The Data Controller within the meaning of the General Data Protection Regulation (GDPR) is:

Zaluti B.V.
Kapittelweg 12
4827 HG Breda, The Netherlands
Phone: +31 (0)76 20 55 239
Email: welcome@zaluti.com

Article 2 Data Collection when Downloading the App

When you download the App from the respective App Store (Apple App Store or Google Play Store), the necessary information is transferred to the operator of the App Store (e.g., username, email address, customer number of your account, time of download). We have no influence on this data collection and are not responsible for it. We only process this data to the extent necessary to securely download the App to your smartphone.

Article 3 Data Processing during App Usage

To enable you to control our scent systems effectively, we process the following data:

a) Use without a user account

You can use the App to control your scent system without creating a user account.

b) User account (optional)

If you choose to create a user account, for example to register your scent system for the extended warranty, we collect the personal data that you voluntarily provide to us:

- First and last name
- Email address
- Username and password

Purpose & Legal Basis: Providing the user account and registering the extended warranty, in accordance with Art. 6(1)(b) GDPR.

c) Settings of the scent system

The schedule set on your scent system is stored on our cloud platform, so that the App can provide its functions.

Purpose & Legal Basis: Providing the App's functions, in accordance with Art. 6(1)(b) GDPR.

d) Required device permissions (Bluetooth)

Our scent systems operate locally and do not connect to the internet or Wi-Fi networks. To establish a connection between your smartphone and the Zaluti scent system, the App strictly requires access to your device's Bluetooth interface. Without this permission, controlling the machine via the App is not possible. We do not use this permission for location tracking.

Purpose & Legal Basis: Technical necessity for contract performance (Art. 6(1)(b) GDPR) and your explicit consent when granting permissions in your operating system.

e) Push notifications

If you explicitly allow this in your smartphone settings, we may send you push notifications regarding your system or account.

Purpose & Legal Basis: Your consent (Art. 6(1)(a) GDPR). You can disable these notifications at any time in your device's system settings.

f) IP address and security

To protect the App and our cloud platform, the IP address of the user is stored on our cloud platform for a maximum of 3 months, so that we can investigate a data breach or other incident. The IP address is not used for any other purpose and is not shared with others.

Purpose & Legal Basis: Our legitimate interest in the security of the App and our cloud platform (Art. 6(1)(f) GDPR).

g) Troubleshooting

To ensure the security and stability of our App, we may collect anonymized diagnostic and crash data in the event of an error.

Purpose & Legal Basis: Our legitimate interest in providing a flawless and secure App experience (Art. 6(1)(f) GDPR).

Article 4 Data Sharing and Disclosure

We do not sell your personal data to third parties. Data is only shared if it is strictly necessary to fulfill our contract (e.g., with secure cloud hosting providers acting as data processors under Art. 28 GDPR), if we are legally obligated to do so (Art. 6(1)(c) GDPR), or if you have explicitly consented. We do not process any special categories of personal data (sensitive data).

Article 5 Data Retention and Account Deletion

We only store your personal data for as long as it is necessary for the purposes stated in this Privacy Policy (e.g., for as long as your user account exists) or as required by statutory retention periods. IP addresses are deleted after a maximum of 3 months.

How to delete your account:

- Directly in the App: navigate to your account settings within the App and select the option to delete your account.
- Via email: send us an email with the subject line "App Account Deletion" to welcome@zaluti.com.

Upon your request, your data will be permanently deleted without undue delay, provided there are no legal obligations to retain it.

Article 6 Children's Privacy

Our App is not intended for use by individuals under the age of 18. We do not knowingly collect personal data from minors.

Article 7 Your Rights as a Data Subject

Under the applicable data protection laws (GDPR), you have the following rights at any time:

- **Right of Access** (Art. 15 GDPR): the right to obtain free information about your stored data.
- **Right to Rectification** (Art. 16 GDPR): the right to request the correction of inaccurate or incomplete data.
- **Right to Erasure** (Art. 17 GDPR): the right to request the deletion of your data.
- **Right to Restriction of Processing** (Art. 18 GDPR): the right to request that the processing of your data be restricted.
- **Right to Data Portability** (Art. 20 GDPR): the right to receive your data in a structured, commonly used format.
- **Right to Object** (Art. 21 GDPR): the right to object to processing based on our legitimate interest, such as the storage of IP addresses and diagnostic data.
- **Right to Withdraw Consent** (Art. 7(3) GDPR): if you have given consent, you can withdraw it at any time with effect for the future.
- **Right to Lodge a Complaint** (Art. 77 GDPR): you also have the right to file a complaint with a competent data protection supervisory authority.

To exercise any of your rights, simply send an email to welcome@zaluti.com.