Clever Life Cybersecurity

Below is a compilation of information and answers to frequently asked questions in relation to the Clever Life Cyber Security protocols and operating standards. Should you have further specific questions or require more information, please contact us at imagin@cleverlife.com.au or 1300 315 083.

Product/ Service Information

- Official product/service name
  - CleverLife Home
- Product/service brochures or overview documentation.
  - Check the App Link on App Store or Play Store
    - https://apps.apple.com/us/app/cleverlife-home/id1660943888
    - https://play.google.com/store/apps/details?id=com.cleverlifehome.app
- Service/system URLs or domains.
  - www.cleverlife.com

SaaS & Technical - Frequently Asked Questions

- What forms of authentication does Clever Life support for administrators and internal users?
  - App users are authenticated via a token-based system, with password encryption using MD5 and RSA for secure transmission. Data is encrypted in transit, and account creation supports username, password, and other authentications.
- What type of user provisioning does Clever Life support?
  - User provisioning is supported via API integrations on mobile applications. This includes Google & Apple services.
- What type of group and RBAC assignment does Clever Life support?
  - We support group management and RBAC assignment. This includes creating groups, assigning members, and setting up assignment rules.
- Which hosting or service provider are the application, database, data, and other supporting components hosted with?
  - Clever Life utilise AWS
- Where are the application, database, data, and other supporting components hosted?
  - AWS, Central Europe Data Center, Frankfurt, Europe.
- What types of audit/action logging and SIEM/centralised logging integration are supported?
  - Audit/action logging and SIEM/centralized logging integration are supported as follows:
    - **Log Operations**: Fuzzy search by start time, end time, and operation content.
    - **Cloud Monitoring**: Query message and API call logs; log storage duration varies by IoT Core subscription.
    - **Macro Functions**: Different log levels for formatted logging and hex dump log output, indicating trace, debug, info, notice, warn, and error events.
- Does Clever Life and/or its hosting provider hold ISO/IEC 27001, 27002, 27017, 27018 or SOC 2+ certification?

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- o Our hosting provider holds the following certifications – ISO/IEC 27001:2022, ISO/IEC 27017:2015, ISO/IEC 27701:2019, ISO 9001:2015, AICPA SOC 2 Type II & SOC 3, TRUSTe, CSA STAR Cloud Security, ioXt Manufacturer Certified, ETSI EN 303645
- Does Clever Life perform regular application penetration testing, code scanning, and vulnerability assessment?
  - o Our host employs a Security Response Center which employs Security Researchers and Partners globally to identify potential threats & vulnerabilities in the IoT PaaS, products and services. Scope includes but not limited to:
    - Hardware Security – firmware fetching and storage media.
    - Firmware Security – Firmware Ota security, firmware static analysis, firmware dynamic debugging, and firmware signature verification.
    - Communication Security – Wi-Fi protocol, Bluetooth protocol, Zigbee protocol
    - System Security - Open port of device local service, privilege separation, system kernel vulnerability, buffer overflow, and information leakage.
    - Encryption and authentication algorithm – Encryption and authentication algorithm
    - Privacy security – User data deletion
    - Server security – Server security test
- What are the Clever Life data-at-rest and data-in-transit encryption standards?

  Data-in-transit encryption standards include:
  1. **Symmetric Encryption**: AES algorithm including multiple key lengths (128/256 bits) and modes (CBC/ECB) are used for encrypting messages sent and received by devices.
  2. **Asymmetric Encryption**: Public and private keys used for encrypting symmetric keys and signing data.
  3. **Hashing Algorithm**: Computing fixed-length hash values, ensuring data integrity.
  4. **Serialization**: Message bodies are serialized and deserialized in JSON format.
  5. **HTTPS**: Secure transmission protocol used for sending keys to devices and clients.
  6. **Base64 Encoding**: Binary raw data and messages are encoded using Base64 for transmission.
  7. **Tuya Bluetooth SDK**: Handles raw data transfer without parsing, ensuring secure data pass-through.

  Data-at-rest encryption standards include:
  1. **AES Encryption**: Audio and video data is encrypted using AES encryption.
  2. **Unique Key Generation**: A unique key is generated in the cloud for each device.
  3. **Key Transmission**: The key is sent to the device and client using HTTPS with double encryption and an MD5 integrity check.
  4. **Data Storage**: Encrypted data is stored with associated encryption keys for file decryption.

- Are there any other security and compliance standards that you are certified for, or adhere to?
  - o Our host has been issued the Europrivacy Certificate, and also passed the GDPR Validation Report (as at April 2024) & CCPA Validation Report (as at Dec 2023).
- What is your application strategy towards supporting and exposing content/data to AI capabilities?

o The application strategy for AI capabilities, including integration with AI tools like Microsoft Copilot, involves:

1. **AI Cloud Services**: Providing technical support and enhancements for applications across various scenarios.
2. **Image Recognition and OCR**: Facilitating powerful recognition capabilities for various types of images and text extraction from images.
3. **Industry Service APIs**: Enabling quick IoT integrations across multiple scenarios with a focus on assets in cloud projects.
4. **API Offering**: Exposing capabilities through APIs for content moderation, parking violation recognition, smart photo albums, etc.
5. **Smart Campus Applications**: Using IoT to build smart educational environments with Tuya's ecosystem.
6. **Configuring AI Devices**: Allowing the setting of image feature configurations on AI inspection devices.
7. **Smart Home and Industry Scenarios**: Providing data management and unique services for improved user experience and operational efficiency.
8. **General Services**: Offering basic services like SMS, email, weather forecast for IoT SaaS applications.
9. **Content Review and Ticket Recognition**: Utilizing AI OCR for automatic content extraction and identification for content review and ticket recognition.

The strategy includes the use of advanced algorithms and cloud capabilities to support and enhance data content for AI processing, ensuring that it is accessible for integration with AI capabilities like Microsoft Copilot.

Mobile App - Frequently Asked Questions

- What mobile operating systems (OS) are supported?
    - **iOS**: Supports iOS 17, 16, 15, 14 with the lowest system version supported being iOS 10 or iOS 11 depending on the app template version.
    - **Android**: Supports Android 13, 12, 11, 10 with the lowest system version supported being Android 4.4, 5.0, or 6.0 depending on the app template version.
    - Example: iOS/iPadOS 13+, Android 10+.

- How is the CleverLife Home mobile app delivered to endpoints?
    - The mobile app is delivered to endpoints through the following process:
        - **Connection Establishment**: The app and device establish a connection using MQTT protocol numbers.
        - **Configuration Retrieval**: The app retrieves necessary configuration information from the cloud service.
        - **IP Address Collection**: Both the app and device collect their respective IP addresses.
        - **Connection Attempts**: The app attempts to connect to the device directly.

- https://play.google.com/store/apps/developer?id=CleverLife+Home
- https://apps.apple.com/us/app/cleverlife-home/id1660943888

CleverLife Home App Privacy Policy

Effective Date: 2021/01/12

Updated Date: 2021/01/12

Clever Life Pty Ltd., its affiliates and subsidiaries ("we", "us", "our", "CleverLife") are committed to protecting your privacy. This Mobile Privacy Policy (this "Policy") describes our practices in connection with information privacy on Personal Data we process through your individual use of the following services, products, and related mobile applications (collectively, the "Products"):

• CleverLife Home Application

Before you use our Products, please carefully read through this Policy and understand our purposes and practices of collection, processing of your Personal Data, including how we use, store, share and transfer Personal Data. In the Policy you will also find ways to execute your rights of access, update, delete or protect your Personal Data.

When you accept this Policy when you register with your Personal Data, or if you start to use our Products and do not expressly object to the contents of this Policy, we will consider that you fully understand and agree with this Policy. If you have any question's regarding this Policy, please do not hesitate to contact us via:

Service Department: 1300 315 083 or support@cleverlife.com.au

CleverLife Home is an OEM branded mobile applications powered, Clever Life control all the Personal Data collected through our Products. The information collected under the direction of Clever Life and the processing of such information shall be limited to the purpose of providing the service for which Clever Life has listed.

Definitions

In this Policy, **Personal Data** means information generated, collected, recorded and/or stored, electronically or otherwise, that can be used to identify an individual or reflect the activity of an individual, either from that information alone, or from that information and other information we have access to about that individual.

Personal Sensitive Data includes personal biometric information, communication records and contents, health information, transaction information, and precise location information. When we collect Personal Sensitive Data from you, we will generate an explicit notification for your consent before we collection personal sensitive data about you.

Smart Devices refers to those computing devices produced or manufactured by hardware manufacturers, with human-machine interface and the ability to transmit data that connect wirelessly to a network, including: smart home appliances, smart wearable devices, smart air cleaning devices, etc.

What Personal Data Do We Collect

In order to provide our Products & Service to you, we will ask you to provide necessary Personal Data that is required to provide those Products & Service. If you do not provide your Personal Data, we may not be able to provide you with the Products & Service.

1. Information You Voluntarily Provide Us

• Account or Profile Data: When you register an account with us, we may collect your name and contact details, such as your email address, phone number, username, and login credentials. During your interaction with our Products, we may further collect your nickname, profile picture, country code, language preference or time zone information into your account.

If you authorize login to the Products with a third-party account, we will obtain from such third party your account information (such as portrait, nickname, region, gender, etc.) which may be bound with your CleverLife Home account for quick login. We will ensure compliance with applicable data protection laws and regulations, as well as agreements, policies or documentations agreed with such third-party regarding sharing personal information, in processing your Personal Data.

• Feedback: When using feedback and suggestion features in our Products, we will collect your email address, mobile phone number and your feedback content to address your problems and solve device failures on a timely basis.

2. Information We Collect Automatically

• Device Information: When you interact with our Product, we automatically collect device information, such as the MAC address of your devices, IP address, wireless connection information, operating system type and version, application version number, push notification identifier, log files, and mobile network information.

• Usage Data: During your interaction with our Sites and Services, we automatically collect usage data relating to visits, clicks, downloads, messages sent/received, and other usage of our Sites and Services.

• Log Information: When you use our app, the system and exception log may be uploaded.

Please note that one cannot identify a specific individual by using Device Information or Log Information alone. However, if these types of non-personal information, combined with other information, may be used to identify a specific individual, such non-personal information will be treated as Personal Data. Unless we have obtained your consent or unless otherwise provided by data protection laws and regulations, we will anonymize and desensitize such non-personal information.

• Location Information: When you enable location-based functions through permission settings on your mobile device, we will collect and process your location information to enable certain functions, such as pairing with your Smart Devices. Also, we may collect information about your real-time precise or non-precise geo-location when you use certain Smart Devices or relevant services, such as robot cleaner and weather service.

Based on your consent, when you enable the geo-fence feature on the Products, your location information will be generated and shared with Google Map services. Please note that Google has corresponding data protection measures, which you may refer to Google Data Protection Terms for more details: https://privacy.google.com/businesses/gdprservices/. You may reject such use of your location information by managing the permission settings in the Products, upon which we will cease to collect and use your location information.

3. Smart Devices Related Information:

• Basic Information of Smart Devices: When you connect your Smart Devices with our Products, we may collect basic information about your Smart Devices such as device name, device ID, online status, activation time, firmware version, and upgrade information.

• Information Reported by Smart Devices: Depending on the different Smart Devices you elect to connect with our Products, we may collect different information reported by your Smart Devices. For example, smart weights or fitness trackers may report your height, weight, body fat mass (BFM), BMI and skeletal muscle mass (SMM); smart cameras may report images or videos captured by it. Particularly, when you proactively consent to our Products connecting with Apple Health, we will share your health data (exclusively to your BMI, height, weight and body fat%) with Apple Health for the sole purpose of measuring and analyzing heath related indicators about you. We will not disclose such health data to any other third party. You may disconnect the Products with Apple Health at any time by managing your HealthKit settings on your smartphone.

Purposes and Legal Basis for Processing Personal Data

The purpose for which we may process information about you are as follows:

• Provide You Services: We process your account and profile data, device information, usage data, location information, and Smart Device related information to provide you with our Products and Services that you have requested. The legal basis for this processing is to perform our contract with you according to our Terms of Use.,

• Improve Our Services: We process your device information, usage data, location information and Smart Device related information to ensure the functions and safety of our Products, to develop and improve our Products and Services, to analyse the efficiency of our operations, and to prevent and trace fraudulent or inappropriate usage. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

• Non-marketing Communication: We process your Personal Data to send you important information regarding the Services, changes to our terms, conditions, and policies and/or other administrative information. Because this information may be important, you may not opt-out of receiving such communications. The legal basis for this processing is to perform our contract with you according to our Terms of Use.

• Marketing Communication: We may process your Personal Data to provide marketing and promotional materials to you on our Products and Services. If we do so, each communication we send you will contain instructions permitting

you to opt-out of receiving future communications of that nature. The legal basis for this processing is your consent. Additionally, if you consent to participate in our lottery, contest or other promotions, we may use your Personal Data to manage such activities.

• Personalization: We may process your account and profile data, usage data, device information to personalize product design and to provide you with services tailored for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of our Products. The legal basis for this processing is your consent.

• Legal Compliance: We may process your Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

If there is any change in the purposes for processing your personal data, we will inform such change to you via email and/or a prominent notice on our website of such changes of purposes, and choices you may have regarding your Personal Data.

Who do We Share Personal Data with?

At Clever Life, we only share Personal Data in ways that we tell you about. We may share your Personal Data with the following recipients:

• To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.

• To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices, and/or networks and systems through which you access and use our Sites and Services.

• To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, incompatible new uses of your Personal Data, and choices you may have regarding your Personal Data.

• As we believe to be necessary or appropriate: (a) to comply with applicable laws and regulations; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

• To subsidiaries or affiliates within our corporate family, to carry out regular business activities.

Except for the third parties described above, to third parties only with your consent.

International Transfer of Information Collected

To facilitate our operation, we may transfer, store and process your Personal Data in jurisdictions other than where you live. Laws in these countries may differ from the laws applicable to your country of residence. When we do so, we will ensure that an adequate level of protection is provided for the information by using one or more of the following approaches:

l Agreement on the basis of approved EU standard contractual clauses per GDPR Art. 46. For more information, see https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en.

If you would like further detail on the safeguards we have in place, you can contact us directly as described in this Privacy Policy.

Your Rights Relating to Your Personal Data

We respect your rights and control over your Personal Data. You may exercise any of the following rights:

• Via the "Me > Personal Center > Account and Security" or via "Me > FAQ & Feedback" in our Products (for Product version 1.0.2 and later).

• By emailing us at support@cleverlife.com.au (for Product version before 1.0.2)

You do not have to pay a fee for executing your personal rights. According to different data protection laws, your request of personal rights will be handled within 15 business days, or within 30 calendar days due to different response requirement.

If you decide to email us, in your request, please make clear what information you would like to have changed, whether you would like to have your Personal Data deleted from our database or otherwise let us know what limitations you would like to put on our use of your Personal Data. Please note that we may ask you to verify your identity before taking further action on your request, for security purposes.

You may:

• Request access to the Personal Data that we process about you;

• Request that we correct inaccurate or incomplete Personal Data about you;

• Request deletion of Personal Data about you;

• Request restrictions, temporarily or permanently, on our processing of some or all Personal Data about you;

• Request transfer of Personal Data to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated;

• Opt-out or object to our use of Personal Data about you where our use is based on your consent or our legitimate interests.

About Delete of the Account: You can find the Delete function through "Me > Personal Center (Potrait) > Account and Security > Delete Account" ("Deactivate Account" for the App version under 3.0.1).

Security Measures

We use commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your Personal Data. The developer provides various security strategies to effectively ensure data security of user and device. As for device access, the developers proprietary algorithms are employed to ensure data isolation, access authentication, applying for authorization. As for data communication, communication using security algorithms and transmission encryption protocols and commercial level information encryption transmission based on dynamic keys are supported. As for data processing, strict data filtering and validation and complete data audit are applied. As for data storage, all confidential information of users will be safely encrypted for storage. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you could immediately notify us of the problem by emailing support@cleverlife.com.au

Data Retention

We process your Personal Data for the minimum period necessary for the purposes set out in this Privacy Policy, unless there is a specific legal requirement for us to keep the data for a longer retention period. We determine the appropriate retention period based on the amount, nature, and sensitivity of your Personal Data, and after the retention period ends, we will destruct your Personal Data. When we are unable to do so for technical reasons, we will ensure that appropriate measures are put in place to prevent any further such use of your Personal Data.

Dispute Resolution

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact the U.S.-based third-party dispute resolution provider (free of charge) at https://feedback-form.truste.com/watchdog/request.

Children's Privacy

Protecting the privacy of young children is especially important to us. The Services are not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide any Personal Data to us. We do not

knowingly collect Personal Data from anyone under the age of thirteen (13) unless we first obtain permission from that child's parent or legal guardian. If we become aware that we have collected Personal Data from anyone under the age of thirteen (13) without permission from that child's parent or legal guardian, we will take steps to remove that information.

Changes to this Policy Policy

We may update this Privacy Policy to reflect changes to our information practices, at least on an annual basis. If we make any material changes, we will notify you by email (send to the e-mail address specified in your account) or by means of a notice in the mobile applications prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about our practices or this Privacy Policy, please contact us as follows:

Clever Life Pty Ltd.

Postal Mailing Address: PO Box 4321, Kirwan Queensland Australia 4817

Email: support@cleverlife.com.au