

[Company]	Title: Privacy Policy for the Website – English Version		
Date of Issue:	[DATE]	Executive Sponsor:	[Group General Counsel]
Version No.:	[1.0]	Policy Owner:	[Focuslight Technology inc.]
Supersedes:	[n/a]	Functional Expert:	[Data Protection Officer]
Valid until:	[indefinite]	Material Scope:	[GDPR Compliance]
Approved by:	[Focuslight group CEO]	Scope:	[group wide]
Connected Policies: [n/a]			

1. GENERAL

- 1.1 Focuslight Group and its subsidiaries and affiliates, including LIMO GmbH and LIMO Display GmbH (hereinafter referred to “we” or “us”) is pleased that you have visited our website and are interested in our company and our products. This Privacy Notice will inform you how we process your personal data. This Privacy Notice covers the personal information we collect, use and disclose through your use of our websites, products and services, either online or offline.
- 1.2 This Privacy Notice and our processing of your personal information will be subject to applicable data protection laws.

2. NAME AND CONTACT DETAILS OF THE CONTROLLER

- 2.1 Controller for the information collected via this website is Focuslight Technologies Inc..

56 Zhangba 6th Road, High-Tech Zone,

Xi'an, Shaanxi 710077,

Peoples Republic of China

Phone: +86 29 8188 9945

Email: sales@focuslight.com

3. DATA PROTECTION OFFICER

Rainer Cloos
Privacy Advisor
Malkwitzer Weg 27
23714 Malente
Germany

Email: rainer.cloos@privacy-advisor.de

4. CATEGORIES OF PERSONAL DATA

- 4.1 In the course of the operation of this website we may collect the following personal data:
- (a) Personal data contained in communication requests sent by you via our publicly available communication channels, such as your email address, name, age, gender, address, professional position and any other personal data, which you may voluntarily disclose to us.
- (b) Personal data or indirectly identifiable data collected due to the technical operation of this website. When you visit our website, we may automatically collect and store certain technical information about your device and internet usage behaviour. Like many other websites and online services, we use “cookies” and other similar tracking technologies to collect some of this information to help enhance your experience on our website, to protect our website and to implement technical security measures. For more information about our use of "cookies" and other tracking technologies, please see our Cookie Notice on the homepage.
- 4.2 In particular we may process the following data in this regard:

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- (a) Internet protocol (IP) address (the number used to identify your computer or modem to the Internet, which can potentially identify your location and Internet Service Provider);
- (b) Browser type;
- (c) Device type;
- (d) Time zone setting;
- (e) Operating system;
- (f) Information about your activities on our websites, including the Uniform Resource Locator (URL) from which you came to our websites and the URLs that you visited on our websites;
- (g) Cookie number;
- (h) Products you viewed or searched for;
- (i) The phone number you used to call us; and
- (j) Pixel tag data as described below.

4.3 During some visits to our websites, we may use software tools such as JavaScript to measure and collect session information, including:

- (a) Page response times;
- (b) Download errors, length of visits to certain pages;
- (c) Page interaction information (such as scrolling, clicks, and mouse-overs);
- (d) Methods used to browse away from the page;
- (e) Other technical information.

5. PURPOSES OF PROCESSING AND LEGAL BASIS

5.1 Contact form and general communication

We will process your communication and contact requests in order to answer them and provide you with the requested information and service. This may include forwarding your communication and the contained personal data to persons within the Focuslight Group, who are best capable of answering your requests or addressing your questions or concerns. Such processing may also involve international transfer to Focuslight Group entities located outside the EU/EEA. Please see further information below in “International Data Transfers”. If your request aims to conclude a contract with us or refers or relates to an existing business relationship, the legal basis will be Art. 6 (1) lit. b) of the General Data Protection Regulation (EU) 2016/679 (“GDPR”). Otherwise, the legal basis will be our justified interests pursuant to Art. 6 (1) lit. f) of the GDPR.

5.2 Newsletter

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- (a) On our website you can also register for a newsletter. The legal basis for data processing in connection with the newsletter will be Art. 6 (1) lit. a) of the GDPR – your prior, explicit consent. Your initial registration will be confirmed via a so called Double-Opt-In procedure, to avoid unauthorized use of email addresses.
- (b) In publishing our newsletter, we cooperate with the online marketing company CleverReach GmbH & Co. KG, Muehlenstr. 43, 26180 Rastede, Germany ([data protection](#)), to whom we may pass on personal data for this agreed purpose only, and with whom we have a data processing agreement (DPA) for data protection.
- (c) Your IP address, the date of registration and time of registration as well as your email address will all be saved when you subscribe to the newsletter. This data is stored solely for the purposes of verification in the case that a third-party improperly uses an email address to subscribe to the newsletter without the knowledge of the rightful owner of the address.
- (d) Subscription takes place based on a double opt-in mechanism in which the data are encrypted using SSL. Because this is required by law as proof of consent, the data can remain legally stored for as long as the newsletter emails are sent based on said consent; storage for any period extending beyond this is legal for as long as we can assume that proof may still be demanded.
- (e) Should you choose to receive our newsletter, please be aware that we use the conversion tracking feature from CleverReach. As part of this feature, the opening and click rates for our newsletter are collected and stored for statistical analysis. The legal basis for the data processing described above is Article 6 (1) lit. f) of the GDPR.
- (f) You may object to the storage of such data, your email address as well as its use as the target address for the newsletter at any time simply by clicking on the unsubscribe link in the newsletter or by sending an email to newsletter@limo.de.

5.3 Other justified interests

We may also process your personal data collected via this website for other justified interests pursuant to Art. 6 (1) lit. f) of the GDPR, which are in particular: website administration, enhancement and improvement of our website and our services, legal defense and enforcement of legal claims, technical security and protection measures, direct marketing for similar products and services as requested by you, however, always accompanied by an information on your right to object to such direct marketing, evaluation of our employees advising and service skills etc.

5.4 Other processing purposes and legal basis

- (a) We further will process your personal data for the following purposes based on the following legal provisions:
 - (i) Art. 6 (1) lit. c) of the GDPR (fulfillment of a legal obligation);
 - (ii) Art. 6 (1) lit. d) of the GDPR protection of vital interests of the data subject or another natural person.
- (b) In very rare occasions, we will ask you for your prior, explicit consent pursuant to Art. 6 (1) lit. a) of the GDPR. Please note already now that if you provide us with your prior,

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explicit consent, you will have the right to withdraw your consent at any time. However, the processing, which occurred prior to your withdrawal based on your consent, will remain legitimate.

6. RECIPIENTS OF PERSONAL DATA

6.1 We may transfer your personal data collected via this website to the following Focuslight Group entities:

No.	Company	Business Address
1.	Focuslight Technologies Inc.	56 Zhangba 6th Road, High-Tech Zone, Xi'an, Shaanxi 710077, China
2.	Focuslight (Dongguan) Microoptics Co. Ltd	2/F #8 Building, Science and Technology Enterprise Pioneering Park, North Area of Songshan Lake High-Tech Zone, 523808 Dongguan, Guangdong, China
3.	Focuslight USA LLC	16192 Coastal Highway, Lewes, Delaware 19958, County of Sussex
4.	Focuslight Europe Ltd	29 Johnstown Road, Cabinteely, Dublin, A96, CH56
5.	LIMO GmbH	Bookenburgweg 4-8, 44319 Dortmund, Germany
6.	LIMO Display GmbH	Bookenburgweg 4-8, 44319 Dortmund, Germany
7.	Focuslight (Haining) Optoelectronics Co., Ltd.	Building 05, CaoHe Road 17, Haining Economic Development Zone, Haining City, Jiaxing City, Zhejiang Province, China

6.2 This will only happen if we reasonably assume that the personnel within the respective Focuslight Group entity can address your request or part of your request more effectively. Further, this will happen, if the technical support of the website or the improvement of our services can be performed more effectively by the personnel of such other Focuslight Group entity.

6.3 Further, we may transfer your personal data to the following categories of recipients for the processing purposes described above: our suppliers (if you placed an order with us), IT-service providers, Cloud service providers, marketing support providers, logistic service providers, accountants, legal advisors, tax consultants, supervisory authorities, regulatory bodies etc.

7. INTERNATIONAL DATA TRANSFER

7.1 As shown above, some of the Focuslight Group entities are located in countries outside the EU/EEA. All of the above Focuslight Group entities signed the EU Standard Contractual Clauses pursuant to Art. 46 of the GDPR. The signed version of the EU Standard Contractual Clauses can be requested via email to hansl@focuslight.com.

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7.2 As regards any other service providers, which are located outside EU/EEA the Focuslight Group is closely monitoring the requirements of Art. 44 ssq. of the GDPR with regard to international transfers of personal data and aims to only collaborate with international data importers, who are legitimated in terms of Art. 44 ssq. of the GDPR.

8. COOKIES AND TRACKING TOOLS

8.1 For further information on cookies please see our Cookie Notice on the homepage.

8.2 Please note in general that we use certain cookies, which are necessary for the functioning of the website based on Art. 6 (1) lit. f) of the GDPR. Other – optional cookies – may require your opt-in consent or at least offer you the possibility of an opt-out.

8.3 Our website uses counting pixel technology provided by WiredMinds GmbH (www.wiredminds.de) to analyze visitor behavior. In connection with this, the IP address of the visitor is processed. The processing occurs only for the purpose of collecting company based information such as company name, for example. IP addresses of natural persons are excluded from any further processing by means of a whitelist. An IP address is not stored in LeadLab under any circumstances.

8.4 While processing data, it is our outmost interest to protect the rights of natural persons. Our interest in processing data is based on Article 6(1)(f) GDPR. At no time is it possible to draw conclusions from the collected data on an identifiable person.

8.5 WiredMinds GmbH uses this information to create anonymized usage profiles of the visit behavior on our website. Data obtained during this process is not used to personally identify visitors of our website. (Exclude from tracking)

9. STORAGE PERIOD

Your data, including personal data, will be stored for the duration of the time needed to answer your questions and requests to your final satisfaction, the provision of our services to you as well as for the duration of the settlement of any mutual claims and disputes resulting from the provision of our services to you. In any case, we will store your personal data for the duration of the applicable statutory retention periods, but at least for the duration of the applicable regular limitation period (which is for example three years for Germany).

10. YOUR RIGHTS

Given the applicability of the respective provisions of the GDPR, you have the right to access, restriction of processing, deletion, data portability, right to object to processing of personal data, right to correction, right to file a complaint with the responsible data protection authority.

11. CONTACT

For all matters regarding the protection of your personal data, you can contact our Data Protection Officer, who is also available to handle requests for information as well as any suggestions or complaints.

12. CHANGES TO THE PRIVACY POLICY

We reserve the right to update this privacy policy from time to time, in particular to incorporate your feedback and to reflect changes in legislation or established case law. We therefore

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recommend that you check this web page regularly in order to remain informed as to how your data is protected and processed.
