**Privacy Statement for InverterCool Products and Services**

Policy active as of Jan 1st, 2022.

**At InverterCool, we take your privacy seriously.**

This Privacy Statement for InverterCool Products and Services (“Privacy Statement”) describes information that InverterCool, Inc. and its subsidiaries and affiliates (collectively, “InverterCool”) collect, use, share, and store, including personal information (i.e., information that personally identifies you, such as your name, email address or billing information, or other data that can be reasonably used to infer this information).

This document focuses on information related to the operation of InverterCool products and services, including the InverterCool air conditioner, InverterCool air conditioner gateway, InverterCool Assistant App, InverterCool Air Conditioner Doctor System，and other products from InverterCool (collectively, “InverterCool Products”). In this Privacy Statement, the expression “InverterCool Products” also includes our Web Apps, Mobile Apps, and Subscription Services as defined in our [Terms of Service.](https://www.ecoer.com/legal/terms-of-service/)

Our Pledge:

1. We will be transparent about the different types of information we collect and how we use them.
2. We will ask your permission before sharing your personal information with third parties for purposes other than at your request or to provide InverterCool’s Products, and to do so only when we think they will provide you with a welcome additional service.
3. We will use best-in-class data security tools to keep your data safe and protect the InverterCool Products from unauthorized access.

Your Consent:

Consent to data collection and processing. By using InverterCool Products, you agree to allow us to collect and process information as described in this Privacy Statement.

Consent to international data transfers. Your personal information may be collected, processed and stored by InverterCool or its service providers in the United States and other countries where our servers reside. Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your personal information, in some of these countries may not be equivalent to those in your country. If you are using InverterCool Products in the European Economic Area or other regions with laws governing data collection and use that may differ from United States law, you consent to the transfer of your personal data to the United States and other countries where InverterCool operates. We have provided you with more information below as to how we protect your personal data when it is transferred internationally: How does InverterCool protect my personal information when it is transferred internationally?

**What information does the InverterCool Air Conditioner and InverterCool Air Conditioner Gateway collect?**

The InverterCool Air Conditioner and InverterCool Air Conditioner Gateway collects:

* Setup information of air conditioners
* Data from the InverterCool Air Conditioner’s sensors
* Heating and cooling usage information
* Technical information from the device

**Setup information of air conditioners**: The contractor will setup the devices when he installs the InverterCool Air Conditioner. InverterCool Air Conditioner Gateway will collect the setup information in order to monitor the contractor’s work, make sure the air conditioner is working properly, and keep you comfortable.

**Data from the InverterCool Air Conditioner’s sensors**: We collect data from several sensors built into the InverterCool Air Conditioner. These sensors collect data such as temperature, pressure in the InverterCool Air Conditioner. InverterCool Air Conditioner Gateway collects these data in order to monitor machine operation, analyze and report failures, analyze energy efficiency and do other functions to keep you comfortable.

**Heating and cooling usage information**: Every time your system turns on and off, InverterCool records the time and duration during which your system was on in order to offer you features such as usage history.

**Technical information from the device**: In order to improve your experience over time and help troubleshoot any problem you may encounter with the InverterCool Air Conditioner, we record your InverterCool Air Conditioner model and serial number, software version, and technical information such as compressor speed.

**What information does InverterCool FDD App collect?**

InverterCool Assistant is a mobile app offered by InverterCool to the contractors. Before installing InverterCool Air Conditioner Gateway, the contractors will show you this privacy statement, if you agree, please provide your personal information and sign it. Without your agreement, the InverterCool Air Conditioner Gateway will not be installed, no any information will be collected. InverterCool will use this information to provide you with after-sales service. This personal information includes:

* Your name
* Your home address
* Email address
* Phone number

**How does InverterCool use the information it collects?**

We use this information to provide, develop and improve InverterCool Products and services, including to make assessments and recommendations about products, safety, or energy use. We may use your contact details to send you this information, or to ask you to participate in surveys about your InverterCool use, and to send you other communications from InverterCool.

We may also use this information in an aggregated, non-identified form for research purposes and to help us make sales, marketing, and business decisions. For example, we use aggregated user information about the number of active air conditioner users in a particular state to help us decide what energy companies might be good partners.

We may use service providers to perform some of these functions. Those service providers are restricted from sharing your information for any other purpose.

We use industry-standard methods to keep this information safe and secure while it is transmitted over your home network and through the Internet to our servers. Depending on your location and type of data, InverterCool may process your personal information on servers that are not in your home country.

**In what circumstances does InverterCool share my information?**

Under no circumstance do we share personal information for any commercial or marketing purpose unrelated to the activation and delivery of InverterCool Products and services without asking you first. Period. We do not rent or sell our customer lists.

The following are the limited situations where we may share personal information:

With your explicit consent: We may share personal information when we have your consent. One example of this is if you sign this privacy statement, it shows that you agree the InverterCool Air Conditioner Gateway to collect information, and agree InverterCool to push maintenance information to the contractors. Maintenance information may include your personal information. Another example of this would be if you use service from a third-party energy company, which works with InverterCool. We may share your personal information to the third-party energy company.

For external processing: We have vendors, service providers, and technicians who help with some of our processing and storage, including helping to answer your questions. They may also assist with monitoring our servers for technical problems. These technicians (as well as InverterCool employees) can access certain information about you or your account in line with this work but these technicians are not allowed to use this data for non-InverterCool purposes.

As part of business transitions: Upon the sale or transfer of the company and/or all or part of its assets, your personal information may be among the items sold or transferred. We will request a purchaser to treat our data under the privacy statement in place at the time of its collection.

For legal reasons: We may provide information to a third party if we believe in good faith that we are required to do so for legal reasons. For example, we may disclose information in response to legal process and we may disclose information in response to lawful requests by public authorities in the United States and other countries for the purposes of law enforcement and national security.

We may share non-personal information (for example, aggregated or anonymized customer data) publicly and with our partners. For example, we may publish trends about energy use or elevated carbon monoxide levels in the home. This information may also be shared with other users to help them better understand their energy usage compared to others in the InverterCool community, raise awareness about safety issues, or help us generally improve our system. We may also share non-personal information with our partners, for example, if they are interested in providing demand-response services or other incentive programs. We take steps to keep this non-personal information from being associated with you and we require our partners to do the same.

If you select an outside party for the purchase, installation, or service of your InverterCool device and share your personal information, we cannot control the collection, storage or sharing of information collected by that party. For example, if you buy a InverterCool Learning Thermostat from a retailer, the retailer may collect personal information as part of the transaction. Or the party that installed the device may retain information that you provided to them to assist them in servicing the device if needed. Always check the privacy policies for any company that collects your personal information.

\*\*How long does InverterCool save my personal information? \*\*

InverterCool generally stores your personal information on InverterCool’s servers as long as you remain a InverterCool customer in order to provide you with InverterCool Products.

All personal information is encrypted as it is transmitted to InverterCool and cannot easily be accessed.

**How does InverterCool protect my personal information when it is transferred internationally?**

As part of our participation in Privacy Shield, if you have a dispute with us about our adherence to the Principles, we will seek to resolve it through JAMS based in the US, and under certain conditions, through the Privacy Shield arbitration process. (In certain circumstances, the Privacy Shield Framework provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in Annex I to the Privacy Shield Principles.) If you have a Privacy Shield-related complaint, please contact us at support@InverterCool.com.

Privacy Shield participants are subject to the investigatory and enforcement powers of the US Federal Trade Commission and other authorized statutory bodies. Under certain circumstances (i.e. personal data sharing under the Onward Transfer Principle with third parties for external processing on our behalf), participants like us may be liable for the transfer of personal information from the EU to third parties outside the EU. Learn more about Privacy Shield here.

We may share, as described in this Privacy Statement, information with our affiliates and subsidiaries, and third parties. We may disclose information in response to legal process and lawful requests by public authorities in the United States and other countries for the purposes of law enforcement and national security.

Please note that this Privacy Statement may change from time to time. We will provide notice of any changes on the website or by contacting you.

If you have any questions, please contact us at support@InverterCool.com.

**CHANGES TO PRIVACY POLICY**:

Please note that this privacy policy may change from time to time. We will provide notice of any changes on the website or by contacting you.