

# Phoenix Contact on Data Privacy

## Phoenix Contact on data protection

We Phoenix Contact (Nanjing) Smart Technology and Solutions Co., Ltd. (Phoenix Contact) are delighted that you are interested in our company, products, and services and would like to provide you with some key information regarding our approach to protecting your personal data.

Protecting personal data is crucial, particularly in tomorrow's Internet-based business models and when developing Internet-based economies. With this declaration on data protection, we therefore want to emphasize our dedication to protecting your privacy. Our staff and the appointed service providers are thoroughly committed to confidentiality and to comply with the provisions of the Chinese data protection laws, the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (FDPA) and other relevant data protection regulations required.

We take the protection of your personal data seriously and strictly adhere to the rules of the data protection laws.

For explanation: "Personal data" means any data that, taken alone or together with other data, is sufficient to identify a natural person (data subject)'s identity, or data that can reflect the activities or status of an identified data subject, for instance, name, physical address, contact data, user ID, IP address, photo and video recordings, location data, etc. The following declaration offers you an overview of how we intend to protect your data.

## Use and circulation of personal data

Any personal data, which you provide us with via our website or among other channels, will solely be used for correspondence with you and is exclusively collected, processed, and saved for the purpose you intended when submitting the data. In addition, we will use this data to update our database and send you, to the extent permitted by law, occasional offers and inform you about new products, services, and other items that might be of interest to you. You acknowledge that information from Phoenix Contact will also be passed on to companies in the Phoenix Contact Group, service providers or other third parties. This may be necessary to perform a service or transaction requested by yourself, such as order processing, event and seminar registrations, for customer service purposes or to provide you with information regarding services or products. When passing on personal data to third parties, we shall limit this to the information necessary to provide our respective services. The respective third party must only use this personal data to perform the service required or the transaction needed, which is commissioned in our order. In doing so, the service providers are obliged in writing to adhere to the applicable data protection laws, usually by an agreement for data processing. You consent that we

will process and use your personal data as described in this Phoenix Contact Data Privacy Policy (“Data Privacy Policy”). You may at any time revoke your consent regarding this use of your personal data by simply contacting us at [info@phoenixcontact.com](mailto:info@phoenixcontact.com).

We shall never share, sell or otherwise provide your personal data collected by us to third parties for marketing purposes.

## Data processing on our web pages

For security and technical reasons, Phoenix Contact automatically processes information transmitted by your browser to its system protocols.

**This potentially includes:** Browser type/version, operating system used, requested URLs (website) on our systems, referrer URL (the website that referred to our website), host name and full IP address of the computer accessing the site, date and time of call, data volumes and file types called.

This data will not be consolidated with other data sources, and we do not carry out personalized statistical evaluations on the basis of this data.

**Notes regarding IP addresses:**

IP addresses are essential for the transmission of websites and data from our servers to your browser. They are the “addresses” for information you request from our web servers. However, IP addresses are regarded as personal data and are therefore processed by us in unabridged form only to the extent technically required.

## Use of PROFICLOUD

To register in our PROFICLOUD, a freely selectable login name and a valid e-mail address as well as a password is required. This data is applied for using PROFICLOUD.

You can delete your user account yourself via the function “remove”. When you remove your user account your e-mail-address is being deleted and only the username remains to ensure traceability in the customer account.

Information on the processing of your personal data within the registration in PROFICLOUD can be found in the table below.

## Information on the processing of personal data

**Designation**                      **Description**

Identity and contact details of the controller

Phoenix Contact (Nanjing) Smart Technology and Solutions Co., Ltd.

Contact details of the data protection officer

The purposes of the processing for which the personal data are intended

Use of PROFICLOUD with the services provided there, as well as other purposes that you consent in this Data Privacy Policy

Categories of personal data that are processed

Freely selectable user name, E-mail address, system log data (for example IP address)

Source (origin) of the data

From the data subject

Recipient(categories) of the data

Within the administration of the system, companies in the Phoenix Contact Group may access the data. Apart from that, there will be no transfer of your data to third parties.  
Service providers who support us in the administration of the website may have access to your data. However, these service providers are obliged by data protection law- compliant agreements (agreement for contract order processing) to not use these data for own purposes.

Phoenix Contact Group refers to  
Phoenix Contact (Nanjing) Smart Technology and Solutions Co., Ltd

No.36 Phoenix Rd, Jiangning Development Zone, Nanjing China,  
PC:211100

Transfer of data to a third country or an international organization and the associated safeguards to protect the data

Your personal data will be transferred to Germany for the purpose of account and subscription management which includes receiving registration data and storing registration data. The recipients include Phoenix Contact Smart Business GmbH, Zionskirchstraße 73a, 10119 Berlin Germany and Billwerk GmbH, Mainzer Landstraße 51, 60329 Frankfurt am Main, Germany.

Storage duration of the data

Your data entered during registration will be stored until you submit a deletion request from your user. You can deactivate your personal user account using the “remove” function. In doing so, your e-mail address will be completely erased from the system and only the freely selected user name will remain in order to ensure traceability of the user actions within the assigned customer account. Thus, for instance, it must remain comprehensible for other users of a customer account which actions were each done within this customer account. System log data will be deleted after 6 months

Rights of the data subjects to access to rectification, erasure or restriction of processing to object to the processing

If the respective legal requirements are met, you are entitled to the following rights: Right to have access to your data that we store; rectification, erasure, restriction of processing your data or the right to object to the processing.

Right to lodge a complaint

If you are of the opinion that the processing of your personal data is unlawful or you have other complaints, you may contact us via [insert contact information] and we will respond in time.

Legal or contractual necessity to provide the data, as well as any consequences of failure to provide the data

Without the specification of your data, the use of PROFICLOUD is not possible.

Automated decision-making / Profiling

There will be no automated decision-making or profiling based on your collected data.

## Cookies

Our Internet pages use cookies in several locations. Cookies are small text files that are stored on your computer and are saved by your browser. They are used to make our Internet pages more user-friendly, effective, and secure. At the same time, these cookies provide information which enables us to optimize our websites in line with user requirements.

Some of the cookies used by us are session cookies. These are automatically deleted once you exit our website. Some cookies are used which are saved for a longer period of time.

The maximum storage period of a cookie can be up to two years.

All cookies on our websites contain purely technical information in a pseudonymized or anonymized format, with no personal data.

If you want to prevent cookies from being saved, in your browser settings select “Do not accept cookies”. If cookies are not accepted by the browser, the scope of functions of our websites may be severely limited. A number of functions are no longer available. This may also be the case if you visit our website in the so-called “Private Mode” of your browser.

We ourselves do not store any information in the LSO (Local Shared Objects) area of your computer, so we do not use so-called “Flash Cookies”. However, other services we may link to, such as YouTube, use this function for own purposes where applicable.

### **We use the following cookies:**

Website	Name of cookie	Function and content	valid until
Proficloud-io.cn, tsd.proficloud-io.cn, impulseanalytics.proficloud-io.cn	ga_opt_out	Is set when a user clicks the Google Analytics Opt-Out link in the privacy policy. Then prevents Google Analytics from collecting data. Contains a string.	12 months
info.proficloud-io.cn	newsletter-allowance	This cookie ensures that pop-ups are only executed once in a certain period of time.	12 months
proficloud-io.cn, tsd.proficloud-io.cn, impulseanalytics.proficloud-io.cn	_ga	Used to distinguish users. Contains an alphanumeric string.	12 months
proficloud-io.cn, tsd.proficloud-io.cn, impulseanalytics.proficloud-io.cn	_gid	Used to distinguish users. Contains an alphanumeric string.	24 hours
proficloud-io.cn, tsd.proficloud-io.cn,	_gat_(UA-XXXXXXX-X)	Creates a new tracker	1 minute

impulseanalytics.proficloud-io.cn		object and assigns it the given name. Contains an alphanumeric string.	
tsd.proficloud-io.cn	PROFICLOUD_TSD_FORWARD	Used to redirect the user to the page he originally requested before prompted to login. Contains an alphanumeric string.	120 seconds
tsd.proficloud-io.cn	PROFICLOUD_TSD_ACCESS_TOKEN	Authentication cookie Contains an alphanumeric string.	1 day
tsd.proficloud-io.cn	PROFICLOUD_TSD_REFRESH_TOKEN	Authentication cookie Contains an alphanumeric string.	30 days
proficloud-io.cn	keycloakData	Local storage Authentication after reload of page	1 hour
impulseanalytics.proficloud-io.cn	PROFICLOUD_IA_SESSION	Session cookie	Session
impulseanalytics.proficloud-io.cn	PROFICLOUD_IA_REFRESH_TOKEN	Authentication refresh token	48 hours
impulseanalytics.proficloud-io.cn	route	Sticky session for load balancing	24 hours

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impulseanalytics.proficloud-io.cn	PROFICLOUD_IA_ACCESSTOKEN	Authentication access token	24 hours
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## Baidu Maps

We use a map from Baidu Maps to visually show where the registered devices are located. When you register in the Proficloud and use the Device Management Service (DMS) including these maps, . You may manually input the address where the registered devices are located. Furthermore, such address information will be transmitted to Baidu Maps Baidu Maps's data protection policy, which is available at <https://lbsyun.baidu.com/index.php?title=open/privacy>, applies here. Using Baidu Maps is an essential function within the Device Management Service (DMS) for users of the Proficloud, where they have located the devices they have registered. The registration of the location is optional for the devices. If you do not consent Baidu Maps' data protection policy, we may not be obtain to use the relevant functions.

## Newsletter

With the following notes we inform you about the contents of our newsletter as well as the registration, dispatch and statistical evaluation procedure and your rights of objection. By subscribing to our newsletter, you agree to receive it and to the procedures described.

**Content of the newsletter:** We send newsletters, e-mails and other electronic notifications containing advertising information (hereinafter "newsletter") only with the consent of the recipients or a legal permission. Insofar as the contents of the newsletter are specifically described in the context of a registration for the newsletter, they are decisive for the consent of the users. Furthermore, our newsletters contain information about our services and us.

**Double-Opt-In and logging:** The registration for our newsletter is done in a so-called Double-Opt-In procedure. This means that after registration you will receive an e-mail asking you to confirm your registration. This confirmation is necessary so that nobody can register with foreign/non-Chinese e-mail addresses. The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes the storage of the time of registration and confirmation as well as the IP address. Changes to your data stored by the shipping service provider are also logged.



**Registration data:** To subscribe to the newsletter, it is sufficient to enter your e-mail address. Optionally, we ask you to enter a name for personal contact in the newsletter. The dispatch of the newsletter and the associated measurement of success is based on the consent of the recipients.

**Cancellation/revocation:** You can cancel the receipt of our newsletter at any time, i.e. revoke your consent. You will find a link to cancel the newsletter at the end of each newsletter. We may store the unsubscribed e-mail addresses for up to three years before we delete them in order to be able to prove a previously given consent. The processing of this data is limited to the purpose of a possible defence against claims. An individual request for deletion is possible at any time, provided that the former existence of a consent is confirmed at the same time.

## Web analyses

On our websites we use different tools for pseudonymized or anonymized web analyses and to evaluate the success of our marketing measures. The following explanations will give you an overview of which tools we use and to what extent. We do not use all tools on all websites.

Information on the processing of your personal data within the web analysis can be found here.

### Google Analytics

We use Google Analytics, a service of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (“Google”) for web analysis and range measurement. Google uses cookies. The information generated by the cookie about users’ visits to our website is generally transmitted to and stored by Google on servers in the United States.

However, Google Analytics is used by us exclusively with activated IP anonymization (so-called IP masking). This means that the IP address of users is shortened by Google. Only in exceptional cases, e.g. if technical failures occur in China, the full IP address is transferred to a Google server in the USA and then shortened there. To the best of our knowledge, the IP address transmitted by the user’s browser will not be merged with other data of the user held by Google.

Google uses the transmitted data on our behalf and on the basis of a data processing agreement under which it is obliged to adhere to the applicable data protection laws, to evaluate the use of our website, to create reports on the activities within our online offering and to provide us with other services associated with the use of the website. With the help of these analysis results we can, for example, identify particularly popular areas of our website and the preferences of users and use the knowledge gained in this way to further improve our offer and make it more targeted and interesting for you as a user.

The acceptance of cookies when using our website is not mandatory; if you do not wish cookies to be stored on your device, you can deactivate the corresponding option in the system settings of your browser. Additionally, you can delete saved cookies at any time in

the system settings of your browser. If you do not accept cookies, however, this may lead to functional limitations. In addition, you can deactivate the use of Google Analytics cookies using a browser add-on if you do not wish the website analysis. You can download this add-on here: <http://tools.google.com/dlpage/gaoptout?hl=en>. You can use the Google Analytics opt-out browser add-on to prevent Google Analytics from using your information. To disable Google Analytics, download and install your web browser add-on. The Google Analytics opt-out add-on is compatible with all common browsers. For the add-on to work, it must be loaded and run correctly in your browser. To learn more about how to disable Google Analytics and correctly install the browser add-on, click here: <https://support.google.com/analytics/answer/181881?hl=en>. As an alternative to the browser add-on, for example on mobile devices, you can also prevent Google Analytics from capturing data by clicking on the opt-out link that you find in the privacy menu of the respective website if this website uses Google Analytics. An “opt-out cookie” will then be set to prevent your data from being collected in the future. The opt-out cookie applies only to the specific browser used when you set it and only to our website and is stored on your device. If you delete the cookies in your browser, you must set the opt-out cookie again. The common browsers also offer a “Do-Not-Track-Function”. If this function is activated, your device informs the web analysis tool that you do not want to be tracked. The data processed by Google Analytics is automatically deleted after a period of 14 months. Data whose retention period has been reached is automatically deleted once a month. You can find out more about Google’s use of data, setting and withdrawal options in Google’s privacy policy: <https://policies.google.com/privacy>

## Google Tag Manager

For reasons of transparency, we would like to point out that we use the Google Tag Manager on our website. Google Tag Manager is a solution that allows providers of websites to manage website tags through a single interface and in this way to integrate in particular Google services into their offering. The Google Tag Manager itself (which implements the tags) does not collect or process any personal data.

## Supplementary notes regarding use and circulation of personal data

Phoenix Contact may be forced to disclose your data and corresponding details by order of a judicial or regulatory action. We also reserve the right to use your data to assert a claim or to defend against legal claims. In compliance with applicable law, we reserve the right to save and pass on personal data and any other data in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, and violations of Phoenix Contact’s terms and conditions of use.

# Secure Internet communication

We make every effort to ensure that your personal data is transmitted and saved utilizing technical and organizational measures, in such a way that it is not accessible to third parties. As a general rule, the Internet is regarded as an insecure medium. In contrast to a telephone line, for instance, transmission of data on the Internet can be more easily wiretapped, recorded or even modified by unauthorized third parties. To ensure the confidentiality of communications with you, we use an AES 256bit SSL/TLS encryption of our website. The encryption used by Phoenix Contact is regarded as secure, based on the latest technological advancements. Operating systems and browsers from earlier versions also achieve this security level. If necessary, you should update the operating system and the browser on your PC to enable use of this highgrade encryption. When communicating via e-mail in an unencrypted manner, complete data security cannot be guaranteed, so we recommend using the postal service for confidential information.

## Update to this Privacy Policy

If Phoenix Contact launches new services, alters its Internet procedures or if the legal requirements or the Internet and IT security technology is further developed, this will be updated in the data protection statement. We therefore reserve the right to alter or modify this statement as required. The current version will be published [here](#).

## Contact us

Should you have any questions that have not been addressed by this data protection statement or you require more detailed information regarding a specific point, please do not hesitate to contact us.

If you do not agree to your personal data being saved or this data becomes inaccurate, we will ensure, upon your request, that your data is corrected, blocked or deleted under the statutory provisions. Upon request, we will send you a list of all your personal data that we have stored.

To do so, please contact:

**Phoenix Contact (Nanjing) Smart Technology and Solutions Co., Ltd.**

No.36 Phoenix Rd, Jiangning Development Zone, Nanjing China, PC:211100

[inbox-china@phoenixcontact-sb.io](mailto:inbox-china@phoenixcontact-sb.io)

Please appreciate that we require proof of identification to handle any requests regarding

your personal data.

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