

LuxpowerTek Privacy Policy

Last Updated: September 11, 2025

Company Name: Shenzhen Lux Power Technology Co., Ltd.

Brand Name: LuxpowerTek

1. Introduction

1.1 Purpose of the Policy

This Privacy Policy is designed to inform you about how **Shenzhen Lux Power Technology Co., Ltd.** (hereinafter referred to as "**LuxpowerTek**" or "we") collects, uses, stores, protects, and shares your personal information during your use of LuxpowerTek products and services (including the monitoring platform, official website, mobile applications, and other related online and offline services, collectively referred to as "Services"). It also outlines your rights regarding your personal information.

1.2 Company and Brand Information

This policy is formulated and implemented by **Shenzhen Lux Power Technology Co., Ltd.**, and applies to all services provided under the **LuxpowerTek** brand.

1.3 Scope of Application

This policy applies to:

- The LuxpowerTek monitoring platform accessed via web, mobile, or desktop interfaces;
- Energy storage inverters, batteries, and related hardware devices connected to the LuxpowerTek monitoring platform;
- Users who purchase products through our channels and register accounts;
- Participants in our events, training sessions, or surveys.

1.4 User Consent and Agreement

By using our Services, you acknowledge that you have read, understood, and agreed to be bound by this Privacy Policy. If you disagree with this policy, please discontinue use of our Services immediately. Certain features (e.g., remote device control) may require additional authorization, and we will seek your explicit consent prior to activation.

2. Definitions

Within this policy:

- **Personal Information:** Any information recorded electronically or otherwise that can, either alone or in combination with other data, identify a specific individual or reflect their activities.
- **Device Information:** Includes serial numbers, models, firmware versions, operational status, and performance data related to LuxpowerTek hardware devices (e.g., energy storage inverters and batteries).
- **Energy Data:** Encompasses operational data related to energy management, such as power generation, consumption, charge/discharge times, battery capacity, and power factor.
- **Location Information:** Geographical data of devices or users obtained via GPS, Wi-Fi, or cellular networks (subject to your authorization).
- **Log Information:** Includes access records, IP addresses, browser types, visit dates and times, and clickstream data on the platform.
- **Third-Party Services:** Services provided by entities other than LuxpowerTek that may interact with our platform, including but not limited to cloud storage, payment processing, mapping, and analytics tools.

3. Information We Collect

We collect your information to deliver safer, more efficient, and personalized Services. Collection methods include information you provide voluntarily, data we collect automatically, and data obtained from third parties.

3.1 Information You Provide

3.1.1 Account Registration Information

When registering a LuxpowerTek account, we collect your name, email address, phone number, company name, country/region, account role (e.g., distributor, installer, end-user), and installer code.

If you log in via a social media account, we may retrieve basic profile details (e.g., nickname, profile picture) from the third party.

3.1.2 Device and System Information

Upon connecting storage devices to the platform, you may need to provide device serial numbers, installation addresses, and configuration parameters.

3.1.3 Customer Support and After-Sales Information

When contacting customer service or requesting after-sales support, we collect your product fault descriptions, photos or videos, contact details, and related order information.

3.1.4 Event Participation or Survey Information

For participation in online training, exhibitions, or user surveys, we may collect registration form details, feedback, audio/video recordings, and similar data.

3.2 Information We Collect Automatically

3.2.1 Device Operational Data

When your devices are connected to the monitoring platform, we automatically receive and record operational data, including power generation, consumption, charge/discharge status, battery temperature, voltage, current, and operating modes.

3.2.2 System Logs and Usage Data

We collect visit dates and times, accessed feature modules, operational records, and system error logs to enhance service stability and security.

3.2.3 Location Information (With User Authorization)

For location-based features (e.g., device tracking, installation site viewing), we collect location data. You can disable location permissions in device or app settings.

3.2.4 Network and Device Identifiers

This includes IP addresses, MAC addresses, device models, operating system versions, and browser types, used for security audits and service optimization.

3.3 Information Obtained from Third Parties

3.3.1 Data from Distributors and Installers

If you purchase equipment through a distributor or installer and register an account, they may share your contact details, device information, and installation data with us.

3.3.2 Data from Business Partners

Our business partners (e.g., energy management platforms, smart home providers) may share data related to your device operations.

3.3.3 Publicly Available Information

We may collect publicly available information related to you (e.g., social media profiles) for identity verification or fraud prevention.

4. How We Use Your Information

We process your information to provide high-quality, personalized, and secure Services. Specific purposes include, but are not limited to:

4.1 Service Provision and Operation

- Create and manage your LuxpowerTek account;
- Verify your identity to ensure account and device security;
- Enable device-to-platform connectivity and communication;
- Facilitate real-time monitoring, historical data queries, and operational alerts.

4.2 Device Monitoring and Remote Management

- Collect and analyze operational data to display power generation, consumption, and battery status;
- Offer remote features (e.g., mode switching, firmware updates, parameter adjustments) to enhance performance and user experience;
- Optimize device strategies using weather and energy price data (with user consent).

4.3 Customer Support and After-Sales Service

- Respond to inquiries, fault reports, installation guidance, and training requests;
- Assist in troubleshooting and provide technical solutions;
- Process warranty and replacement requests while tracking service progress.

4.4 Security and Fraud Prevention

- Monitor and analyze suspicious activities to prevent unauthorized access, data tampering, or other security threats;
- Detect and prevent multi-account abuse, fraudulent installation records, or other misconduct;
- Comply with cybersecurity regulations (e.g., data audits, incident logging).

4.5 Legal Compliance and Dispute Resolution

- Fulfill obligations under applicable laws (e.g., tax reporting, export controls, government regulations);

- Assist in handling complaints, dispute resolution, or legal proceedings;
- Respond to legitimate requests from law enforcement or regulatory authorities.

4.6 Product Improvement and Research

- Collect anonymized or de-identified operational data to refine product design and software functionality;
- Conduct performance analysis and trend studies to support new product development.

4.7 Marketing (With User Consent)

- Send notifications about new product launches, promotions, or event information;
- Provide personalized recommendations based on your device type and usage habits;
- Conduct market research to better understand customer needs.

5. How We Share Your Information

We do not sell your personal information to third parties. However, we may share your information under the following circumstances:

5.1 With Service Providers

- To enable data storage, push notifications, payment processing, logistics, and installation/maintenance, we may share necessary information with vetted service providers;
- These providers are bound by confidentiality agreements and may only use data within the scope of services rendered to us.

5.2 With Business Partners

- When you purchase or manage devices through distributors or installers, we may share relevant information to facilitate ongoing support;
- In joint promotion or product development projects, we may share data with partners as needed.

5.3 Legal Requirements

- We may disclose information when required by laws, court orders, law enforcement, or regulatory authorities;
- In cases involving public safety, fraud investigations, or intellectual property protection, we may share data in accordance with applicable laws.

5.4 Corporate Restructuring

In the event of mergers, acquisitions, reorganizations, asset transfers, or bankruptcy, your information may be transferred as part of the assets to the new entity.

We will notify you of such changes via announcements or other means and ensure the recipient adheres to this Privacy Policy.

6. International Data Transfer

As LuxpowerTek operates globally, your information may be transferred to servers or partners outside your country/region for processing.

6.1 Countries and Regions of Data Transfer

- Our servers and partners may be located in China, Europe, the Americas, Africa, and other regions;
- Data protection laws in these jurisdictions may differ from those in your region.

6.2 Legal Basis for Cross-Border Transfer

- For EU residents, we comply with GDPR requirements, utilizing Standard Contractual Clauses (SCCs) or other lawful transfer mechanisms;
- For users in other jurisdictions, we adhere to local data protection laws.

6.3 Safeguards

- During cross-border transfers, we employ data encryption, access controls, and data minimization principles to prevent unauthorized access, leaks, or tampering;
- Only personnel with legitimate business needs may access your data, with regular security audits conducted.

7. Data Retention and Deletion

7.1 Retention Principles

- We retain your personal information for the shortest period necessary to fulfill the purposes of collection, unless required or permitted by law to retain it longer.
- Different types of information may have varying retention periods, such as:
 - Account information: Retained during account activity and for 2 years post-deactivation (for after-sales and compliance purposes);

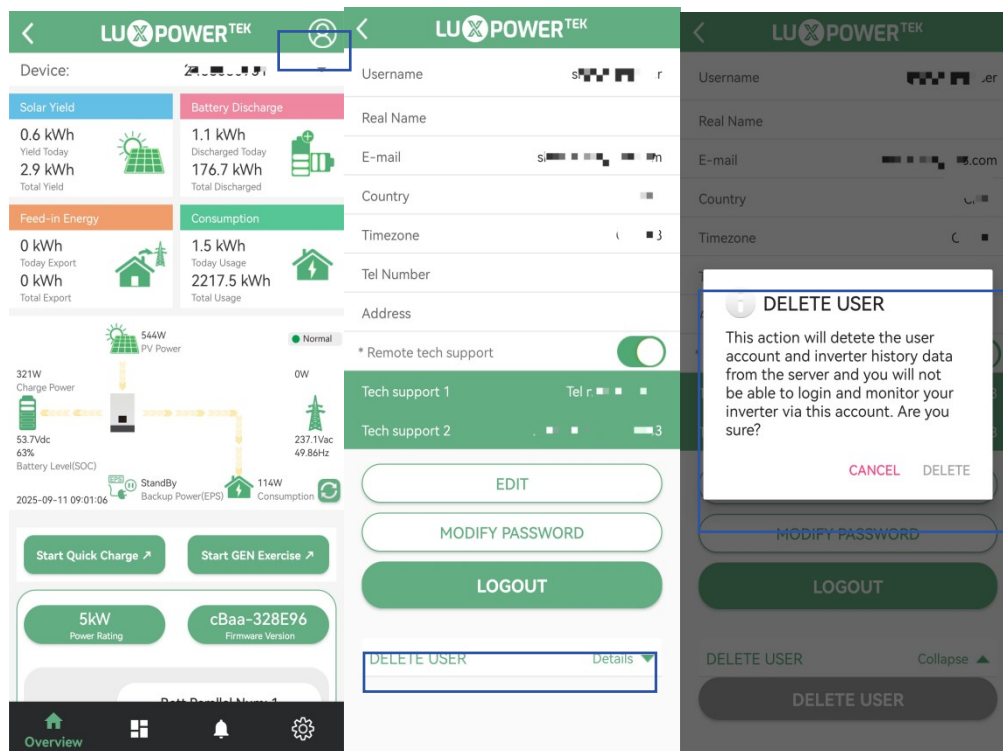
- Device operational data: Generally retained for 1 year for performance analysis and support;
- After-sales and customer service records: Retained for 2 years from the record date.

7.2 Deletion Process

- When you request the deletion of your personal information, or when the information is no longer necessary for the purposes for which it was collected, we will take reasonable measures to delete or anonymize the information.
- Before deletion, we may verify your identity to ensure security.
- Certain information may not be immediately deleted if required by applicable laws or regulations (for example, tax or audit-related records).

Account Deletion Steps:

1. Log in to the app and go to the **User Center**.
2. Expand the menu and click the **DELETE USER** button.
3. Enter your username and password to confirm.
4. Click **DELETE USER** again to complete the deletion. Once confirmed, your account and associated personal data will be permanently deleted, except for information that must be retained under applicable laws.



7.3 Anonymization and Irreversible Processing

- When data is used for statistical analysis or product improvement without linking to specific users, we will de-identify or anonymize it;
- Anonymized data is not considered personal information and may be retained and used without restriction.

8. Your Rights (Globally Recognized)

Under applicable data protection laws (including EU **GDPR**, UK **GDPR**, Singapore **PDPA**, South Africa **POPIA**, etc.), you are entitled to the following rights:

8.1 Right to Access

You may request confirmation of whether we process your personal information and obtain a copy of such data.

8.2 Right to Rectification

You may request correction of inaccurate or incomplete personal information.

8.3 Right to Erasure

In specific circumstances (e.g., data no longer necessary, consent withdrawn, unlawful processing), you may request deletion of your personal information.

8.4 Right to Restriction of Processing

You may request restriction of processing your information, such as during disputes over accuracy or while you object to processing.

8.5 Right to Data Portability

You may request that we transfer your personal information to you or a designated third party in a structured, commonly used, machine-readable format.

8.6 Right to Withdraw Consent

Where we rely on your consent for processing, you may withdraw it at any time. This will not affect processing conducted prior to withdrawal.

8.7 Right to Lodge a Complaint

If you believe our data processing violates applicable laws, you may file a complaint with your local data protection authority.

How to Exercise Your Rights: Submit requests via the “Contact Us” section; we will respond within the legally mandated timeframe.

9. Children’s Privacy Protection

9.1 Minimum Age Requirement

- Our Services are not intended for children under 16 (or the age specified by local laws in your jurisdiction);
- If you are below the relevant age, please do not provide any personal information.

9.2 Principles for Processing Children’s Data

- If processing minors’ data is necessary for specific services, we will obtain parental consent beforehand;
- Upon discovering unauthorized collection of minors’ data, we will promptly delete it.

10. Cookies and Tracking Technologies

10.1 Types of Cookies

We use various types of Cookies and similar technologies on our website and applications, including:

- **Essential Cookies:** Enable basic platform functions like login, account verification, and security;
- **Functional Cookies:** Remember your preferences (e.g., language, time zone);
- **Analytics Cookies:** Track visit statistics, usage patterns, and feature interactions to optimize the platform;
- **Marketing Cookies:** Used for personalized ads and promotion analysis (with your consent).

10.2 Purposes of Cookies

- Ensure service security and stability;
- Enhance user experience and interface responsiveness;
- Measure and analyze service performance;

- Support marketing and retargeting campaigns (with user consent).

10.3 User Management of Cookies

- You may delete or disable Cookies via browser or device settings;
- Disabling Cookies may impair certain functionalities (e.g., auto-login, preference saving).

For detailed information on Cookie types, usage, and management, please refer to our comprehensive [Cookies Policy].

11. Information Security Measures

11.1 Technical Security Measures

- **Data Encryption:** Utilizes SSL/TLS encryption for data transmission and storage;
- **Access Control:** Limits access to personal information to employees with legitimate business needs, with tiered permission management;
- **Firewalls and Intrusion Detection:** Monitors and defends against potential cyberattacks.

11.2 Administrative Security Measures

- **Internal Training:** Conducts data protection and information security training for employees;
- **Confidentiality Agreements:** Requires all employees and partners with access to sign confidentiality agreements;
- **Regular Audits:** Performs security audits and risk assessments on systems and processes.

11.3 User Security Obligations

- Safely store your account credentials and avoid sharing them;
- Log out after using public devices;
- Update applications and device firmware promptly to receive the latest security patches.

12. Third-Party Links and Services

12.1 Third-Party Privacy Policy Notice

- Our Services may contain links to third-party websites, applications, or services, whose privacy practices are not governed by this policy;
- Please review the privacy policies of these third parties before use.

12.2 Third-Party Liability Disclaimer

- We are not responsible for the independent collection, use, or disclosure of your information by third parties;
- If you log in or bind devices via third-party platforms (e.g., smart home or energy management systems), please review and agree to their terms.

13. Policy Updates

13.1 Update Process

- We may periodically update this Privacy Policy to reflect changes in laws, technology, or business practices;
- Significant updates will be communicated via email, in-app notifications, or website announcements.

13.2 Update Notification

- The updated policy takes effect from the “Effective Date”;
- Continued use of our Services after an update signifies your acceptance of the revised policy.

14. Contact Us

For any questions, comments, or complaints regarding this Privacy Policy or the processing of your personal information, please contact us at:

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