PRIVACY NOTICE – Controllers, Apps and the Cloud

(Last updated: 30 Sep 2026)

1. Introduction

The purpose of this privacy notice is to provide information on how Speria (Rotem) Ltd ("**Speria**" or "**we**") processes your personal data in connection with:

i. your use of the internet connected services and functionalities offered in connection with the use of climate and irrigation controllers labelled and/or marketed by Speria (Rotem) Ltd or any of its affiliates (the "**Controller**"),
ii. the use of our apps (the "**App**"), and
iii. the use of Speria (Rotem) Ltd's cloud services (the "**Cloud**").

We respect your privacy and duly protect the personal data we process about you. The following describes, among other things, how we collect, process, and share your personal data.

Note that if the user of the Controller or the App is a legal entity, all or some of the below enumerated categories of data may not constitute personal data. For data that is not considered personal data, we refer you to the Terms of Use for the Controller and the Terms of Use for the App regarding our rights to use, share and transfer such data.

2. Description of personal data processing activities

2.1 The Controller

We collect the following information through your use of the Controller:

What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
Name of the user. Geographical location of the site where the Controller is used. The information collected by the Controller, such as technical parameters about the climate, information regarding ventilation equipment,	To be able to provide you, and integrators with whom you do business, the data collected by the Controller in order for you to get an overview as well as access to analytical services and to give integrators the opportunity to run	The processing is based on our legitimate interest in being able to offer you and integrators with whom you do business, access to the data collected by the Controller so that you and the integrators can run the analytics necessary in order for	As long as you actively use the Controller.

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What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
water/feed data for the animals, animal health, and controller diagnostics.	analytics on the collected data.	you both to run an effective operation. We have carried out and documented a balancing test, where we have weighed our interest in performing the processing activities against the data subjects' interest in not having their personal data processed. In this assessment we note that the processing only relates to non-sensitive data of a mostly business related nature and that the processing of personal data not only benefits the data subject but is in many cases integral to the data subjects choice to purchase the Controller. We consider that our interest in performing the processing activities outweighs the interests of the data subjects' in not having their personal data processed. Please contact us using the contact information provided below if you would like access the complete balancing test performed to reach this conclusion or if you would like to object to it.	
Name of the user and the geographical location of the site where the equipment is used and any	To provide you with troubleshooting services for the Controller.	To fulfil our obligations under the Terms of Use entered into with you regarding the	Until the troubleshooting service is completed.

What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
additional information disclosed by you.		functionalities offered through the use of the Controller. If you do not provide the personal data, we will not be able to provide you with troubleshooting services.	

2.2 The App

We collect the following information through your use of the App:

What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
Name, email address and password.	To administrate your account and provide you access to the App and its related services.	To fulfil our obligations under the Terms of Use entered into with you and your request of gaining access to the App. If you do not provide the personal data, we will not be able to grant you access to the App and the related services.	As long as you have an active account for the App.
Name, address, email address, bank account and payment details.	To process your payment.	The processing is necessary to fulfil our obligations under the Terms of Use entered into with you including to provide you with the paid services.	1 year according to bookkeeping laws.
Geographical location of the site where the equipment is used.	To display your site's location in the App and present you with an overview. This information is also used to provide a	The processing is necessary to fulfil our obligations under the Terms of Use entered into with you regarding the services	As long as you have an active account for the App.

What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
	weather forecast for the location of the site.	as described in the Terms of Use.	
App use and performance data, IP address, session id, user-agent strings.*	To gain insights into user behavior, traffic sources, audience demographics, and engagement metrics. This information helps us optimize app performance, improve user experience, and measure marketing efforts.	The legal basis for the processing is your consent.	14 months

* IP Addresses are anonymized by default. User-agent strings are information about the user's browser and device. This includes data such as browser type, operating system, device type, and screen resolution. Session ID:s are randomly generated identifiers assigned to each session, allowing us to track user interactions across a single session without tying it to individual users.

2.3 The Cloud

We collect the following information through your use of the Cloud.

What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
Name, email address and password.	To administrate your account and provide you access to the Cloud and its related services.	The processing is based on our legitimate interest in being able to offer you, as a representative of an integrator or other business partner of ours, access to the data collected by the Controller. We have carried out and documented a balancing test, where we have weighed our interest in performing the processing activities against the data subjects' interest in not having their personal data processed. In this assessment we note that the processing only relates to non-sensitive data of a mostly business	As long as you have an active account for the Cloud.

What personal data is processed?	For what purpose is the personal data processed?	What are the legal bases for processing of personal data?	How long is the personal data stored?
		related nature and that the processing of personal data is integral in order for us to provide the services requested by the company that you represent. We consider that our interest in performing the processing activities outweighs the interests of the data subjects' in not having their personal data processed. Please contact us using the contact information provided below if you would like access the complete balancing test performed to reach this conclusion or if you would like to object to it.	

3. Who has access to your personal data?

We have implemented appropriate technical and organisational measures to protect your personal data against loss, accidental and unlawful access and unauthorised disclosure. The number of persons with access to your personal data is limited. Only individuals within Speria that need to process your personal data in accordance with the purposes above have access to your personal data.

We may also share your personal data with suppliers and partners that carry out services on our behalf or in other ways collaborate with us as set out in the table below:

Recipient/ category of recipients	Personal data shared with the recipient(s)	Location of the recipient
Provider of our Enterprise Resource Planning system for TrioAir: Microsoft Azure	All the data specified in paragraphs 2.1; 2.2 is saved in the cloud of Azure. For Microsoft Azure legal information: https://azure.microsoft.com/en-us/support/legal/	Microsoft Azure headquarters is located at **1 Microsoft Way, Redmond, USA**
IT-service providers (including cloud service	All the data who specified in paragraphs 2.1; 2.2 is saved in the cloud of Azure.	Microsoft Azure headquarters is located

Recipient/ category of recipients	Personal data shared with the recipient(s)	Location of the recipient
providers) for TrioAir: Microsoft Azure	For Microsoft Azure legal information: https://azure.microsoft.com/en-us/support/legal/	at **1 Microsoft Way, Redmond, USA**
Provider of our Enterprise Resource Planning system for RotemNet Web: Amazon AWS	All the data which is specified in paragraphs 2.1; 2.2 is saved in the Amazon AWS cloud. Full compliance with GDPR requirements when using AWS services. For Amazon AWS legal information: https://aws.amazon.com/compliance/gdpr-center/	AWS headquarters is located at 440 Terry Ave N, Seattle, WA 98109, United States Phone Number: +12062661000
IT-service providers (including cloud service providers) for RotemNet Web: Amazon AWS	All the data in paragraphs 2.1; 2.2 is saved in the Amazon AWS cloud. Full compliance with GDPR requirements when using AWS services. For Amazon AWS legal information: https://aws.amazon.com/compliance/gdpr-center/	AWS headquarters is located at 440 Terry Ave N, Seattle, WA 98109, United States Phone Number: +12062661000
Speria MTech USA, LLC	Name of user of the Controller. Geographical location of the site where the equipment is used. The information collected by the Controller, such as technical parameters about the climate, information regarding ventilation equipment, water/feed data for the animals, animal health and controller diagnostics.	115 Perimeter Center Place NE, Suite 845 Atlanta, GA 30346, USA.
Ecommerce solution partner Bright Market, LLC d/b/a FastSpring ("**FastSpring**").	Payment information, contact information, name, and IP address. FastSpring processes personal data as controller. Please see the FastSpring privacy statement for more information.	Netherlands / United States
Analytics service provider, Google	App use and performance data, IP address, session id, user-agent strings. See the Google Privacy & Terms.	Data collected through Google Analytics may be transferred to and stored in servers located in various countries, including but not limited to the

Recipient/ category of recipients	Personal data shared with the recipient(s)	Location of the recipient
		United States and other countries where Google has data processing facilities.
App performance monitoring service: Functional service, Inc. ("**Sentry**")	App use and performance data.	United States
Integrators with whom you do business.	Name of user of the Controller. Geographical location of the site where the equipment is used. The information collected by the Controller, such as technical parameters about the climate, information regarding ventilation equipment, water/feed data for the animals, animal health and controller diagnostics.	The location of the Integrator is usually the country in which you reside. However, if you have entered into a business relationship with an integrator from a different country than your country of origin, please note that your personal data may be exported to the country of domicile of the integrator.
Local dealers and resellers of Speria products that assists with troubleshooting.	Name of user of the Controller. Geographical location of the site where the equipment is used. The information collected by the Controller, such as technical parameters about the climate, information regarding ventilation equipment, water/feed data for the animals, animal health and controller diagnostics.	The location of the dealer or reseller is usually the country in which you reside. However, in some cases, the dealer or reseller may be located in a neighbouring country to the one you reside in.
Regional Speria company that assists with troubleshooting	Name of user of the Controller. Geographical location of the site where the equipment is used. The information collected by the Controller, such as technical parameters about the climate, information regarding ventilation equipment, water/feed data for the animals, animal health and controller diagnostics.	The location of the regional Speria company is usually the country in which you reside. However, in some cases, the regional Speria company may be located in a neighbouring country to the one you reside in.

In addition to being processed in Israel, your personal data will be transferred to other countries outside of the EU/EEA, as described in the table above, which may have a lower level of personal data protection than within the EU/EEA. The transfer is needed to fulfil the purposes

stated under Section 2. When processing and transferring personal data to countries outside the EU/EEA, we rely on the European Commission's adequacy decisions (i.e. countries outside the EU which the European Commission deems to offer an adequate level of data protection) or use standard contractual clauses approved by the European Commission to ensure a sufficient level of protection for your personal data. The adequacy decisions can be found here and the standard contractual clauses can be found here. If you would like a copy of the actual Standard Contractual Clauses entered into by us with a certain recipient or category of recipients, please contact us at the contact information detailed below.

4. Cookies

4.1 Our use of cookies

A cookie is a small text file containing information which is stored on your device. We can also use other technologies to deploy and retrieve information on your device. Cookies and other technologies used to deploy or retrieve information from your device are collectively referred to as "**Cookies**". For more information about how cookies work, please be referred to www.allaboutcookies.org.

We use Cookies to generate data on App use. Since the App would not work without strictly necessary Cookies, this category of Cookies is always on when you use our App. The legal basis for using strictly necessary Cookies is our legitimate interest in providing you with a functioning App.

For preferences, statistics and marketing Cookies, we rely on your consent. You are not required to consent to these Cookies to use the App, but some functions may be limited if you do not consent.

When you accept the Terms of Use of the App you will be asked to consent to our use of Cookies on your device.

For more information and guidance on how to withdraw your consent, please contact us at Customer Support - Speria.

Some of our Cookies are provided by third parties. In some cases, such Cookies collect personal information which is shared with these third parties as separate controllers.

4.2 What cookies are used?

On our App we use the following types of cookies. The tables set out the specific cookies within each category that are used on the App and specify the purpose for each cookie, whether any information comes from or will be transferred to a third party, as well as how long the information will be stored. We will not use Cookies for any other purpose than what is stated below.

Cookie declaration last updated on [0.1 Nov 2024].

4.2.1 Necessary

Necessary Cookies help make an App usable by enabling basic functions like navigation and access to secure areas of the App. The App cannot function properly without these Cookies.

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Name	Provider	Purpose	Expiry	Type
x-ms-cpim-csrf	Microsoft Azure B2C	Anti-forgery cookie for security in Azure B2C login processes.	Session	Security
x-ms-cpim-sso	Microsoft Azure B2C	Stores user session data to enable Single Sign-On (SSO) functionality in Azure B2C.	Session	Functional
MC1	Microsoft	Used internally by Microsoft for telemetry purposes	1 year	Functional

4.2.2 Preferences

Preference Cookies enable an App to remember information that changes the way the App behaves or looks.

Name	Provider	Purpose	Expiry	Type

4.2.3 Statistics

Statistics Cookies help app providers understand how visitors interact with their apps by collecting and reporting information anonymously.

Name	Provider	Purpose	Expiry	Type
_ga	Google Analytics	Registers a unique ID that is used to generate statistical data on how the visitor uses the App.	2 years	Analytics
_ga_<container>	Google Analytics	Maintains session state data for specific Google Analytics properties.	2 years (varies by browser limits)	Analytics
_gid	Google Analytics	Registers a unique ID that is used to generate statistical data on how the visitor uses the App.	1 day	Analytics
_gac	Google Analytics	This cookie stores campaign information related to the user and expires after 90 days.	90 days	Analytics

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Name	Provider	Purpose	Expiry	Type
_gat cookie	Google Analytics	This cookie is used to throttle request rate and expires after 1 minute.	1 minute	Analytics

4.2.4 Marketing

Marketing Cookies are used to track visitors across websites and apps. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Name	Provider	Purpose	Expiry	Type

4.2.5 Unclassified

Unclassified Cookies are Cookies that we are in the process of classifying, together with the providers of individual Cookies.

Name	Provider	Purpose	Expiry	Type

5. What are your rights?

Speria (Rotem) Ltd., reg. no. 512025966, address : 18 Hasivim Street, Petach-Tikva 49517, Israel, email address: Customer Support - Speria is the data controller of the processing of your personal data. This means that we are responsible for your personal data being processed correctly and in accordance with applicable laws. Read more about your rights below.

(a) **Right to access**: You are entitled to know what personal data we are processing about you, for which purposes we are processing the personal data and who we share your personal data with *etc*. You also have the right to gain access to the personal data and request a copy of such data.

(b) **Right to rectification**: If you notice that we have incorrect or incomplete personal data about you, you can always request that we correct or complete such personal data.

(c) **Right to erasure and restriction**: You have a right to request that we, in some cases, delete your personal data or that we restrict our processing for a certain period of time. Please note that deletion or restriction of your personal data may for example result in us not being able to provide you with access to the App.

(d) **Right to object**: You have the right to object to the processing we perform based on our legitimate interest.

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(e) **Right to data portability**: In cases when we base our processing on your consent or the fulfilment of an agreement with you, you are entitled to extract your personal data in a structured, commonly used and machine-readable format and to transfer the personal data to another controller.

(f) **Withdrawal of consent**: If you have given your consent to processing of your personal data for an explicit purpose you may always withdraw your consent. If you want to withdraw your consent, you may contact us through the contact information provided above.

(g) **Equal Treatment:** You have the right to equal treatment and not to be retaliated against, regardless of your exercise of your privacy rights.

(h) **Opt Out**: You have the right at any time to opt out of the sale of your personal data or the sharing of your personal data for targeted or cross-context behavioural advertising. We do not presently sell or share Personal Data for targeted or cross-context behavioural advertising.

If you have questions regarding how we process personal data about you, you are most welcome to contact us at the contact information stated above.

If you have any objections or complaints about the way we process your personal data, you have the right to file a complaint with the data protection authority of any EU member state (you can find contact information to the respective data protection authorities here) or the Israeli data protection authority.

To exercise any of your rights, you or your authorized agent may or send us an email at Customer Support - Speria . Before we may fulfil a request to access, correct, or delete your information, we are required to verify your identity. We will ask you to verify, at a minimum, your name, email address, and account information. When providing us this information, you represent and affirm that all information provided is true and accurate. If we are unable to verify that the consumer submitting the request is the same individual about whom we have collected personal data, or an authorized agent, we may contact you for more information, or we may not be able to meet your request. Only you, or an agent legally authorized to act on your behalf, may make a verifiable request related to your personal data. If you are making a request as the authorized agent of a consumer, we will ask you also submit reliable proof that you have been authorized in writing by the consumer to act on such consumer's behalf.

We will make every effort to respond to your request within 45 days from when you contacted us. If you have a complex request, we may require up to 90 days to respond. We may contact you within 45 days from the date you contacted us to inform you if we need more time to respond.

We do not offer links to opt out of the sale or sharing of personal data or to limit the use or disclosure of sensitive personal data, as we do not offer your personal data for sale, share it for targeted or cross-context behavioural advertising, or use sensitive personal data for reasons other than those expressly permitted by regulations under the California Consumer Privacy Act. For these reasons, we also do not process opt-out preference signals.

6. Personal Data of Children

We do not intentionally or knowingly collect any personal data from children under the age of sixteen (16). Children under the age of sixteen (16) should not submit any personal data through the Controller, the App, or the Cloud. If you believe a child under the age of sixteen (16) may

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have provided personal data to us, please contact us by sending us an email at https://speria.com/customer-support/ and we will use reasonable efforts to delete it from our files.

7. Changes

If any changes are made concerning the processing of your personal data, we will inform you of such changes by publishing an updated version of this privacy notice here.

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