**Grayshott Gigabit Privacy Policy**

**For Users of Plume Pods & HomePass App**

*Last updated: 15th May 2023*

Grayshott Gigabit collects, and processes information provided directly by you when you connect to the Plume Wi-Fi Pod and install the HomePass App and register for an account to use the App. Details of information & data collected, stored, used, and your rights are mentioned below by Plume.

Plume Design, Inc. and its subsidiaries and affiliates (collectively, “**Plume**”, “**we**”, “**our**” or “**us**”) design products and services that optimize Wi-Fi connectivity and provide visibility and control to connected devices on the Wi-Fi or wired network. This Privacy Policy (“**Policy**”) explains how we collect, use, share, and safeguard your Personal Information. It also tells you about rights and choices that you may have with respect to your Personal Information, and how you can contact us if you have any questions or concerns.

This Policy applies to the Plume products and services, including our websites, apps, devices and other software or hardware that we may offer, collectively referred to as our “**Services**”. It applies to the activities for which Plume is a “data controller” which means that Plume decides why and how Personal Information is processed. We may also process Personal Information as a “data processor” when providing services to our business customers. In that context we process Personal Information on their behalf and they determine why and how the Personal Information is processed. To learn more about this processing of Personal Information, please refer to their respective privacy policies, unless you are specifically referred to this Policy.

1. [Personal Information We Collect](https://www.plume.com/homepass/legal?tabId=privacy#PersonalInformationWeCollect)
2. [How We Use Personal Information](https://www.plume.com/homepass/legal?tabId=privacy#HowWeUsePersonalInformation)
3. [How We Disclose Your Personal Information](https://www.plume.com/homepass/legal?tabId=privacy#HowWeDiscloseYourPersonalInformation)
4. [Data Retention](https://www.plume.com/homepass/legal?tabId=privacy#DataRetention)
5. [Children’s Privacy](https://www.plume.com/homepass/legal?tabId=privacy#ChildrensPrivacy)
6. [Data Security](https://www.plume.com/homepass/legal?tabId=privacy#DataSecurity)
7. [Your Rights And Choices](https://www.plume.com/homepass/legal?tabId=privacy#YourRightsAndChoices)
8. [Cross-Border Data Transfers](https://www.plume.com/homepass/legal?tabId=privacy#Cross-BorderDataTransfers)
9. [Changes To This Policy](https://www.plume.com/homepass/legal?tabId=privacy#ChangesToThisPolicy)
10. [How To Contact Us](https://www.plume.com/homepass/legal?tabId=privacy#HowToContactUs)

**1. PERSONAL INFORMATION WE COLLECT**

We collect Personal Information from various sources, which are described below. For the purpose of this Policy, “**Personal Information**” means any information relating to any identified or identifiable individual. Where applicable, we will indicate whether and why you must provide us with your Personal Information, as well as the consequences of failing to do so. If you do not provide your Personal Information, when requested, you may not be able to benefit from our Services if that information is necessary to provide you with them or if we are legally required to collect it.

**A. PERSONAL INFORMATION PROVIDED BY YOU**

**When you create a Plume account**

You must create a Plume account to set up your Plume network. When you create a Plume account, we ask for some Personal Information, including your name and email address. Your email address will be your Plume account username, which you will need to use to log in to your account.

**B. INFORMATION COLLECTED VIA AUTOMATED MEANS**

**When you use Plume Services**

To deliver the best Wi-Fi experience, quality of service and security, we automatically collect some information when you use our Services, such as your Plume network at home (“HomePass”) or a Plume network at a small business location (“WorkPass”) such as:

* **Information about your connected devices**. This information includes the type of device you use, operating system version, along with attributes gleaned from its network metadata including (but not limited to) its dynamic host configuration protocol (“DHCP”) fingerprint, hypertext transfer protocol (“HTTP”) user agent information, UPnP and mDNS discovery information, a sampling of domain name system (“DNS”) requests, device hostname, the nicknames given to the device and network access points, the unique addresses of the device and network access points.
* **Person Profiles**. This information includes person profiles, profile nicknames and profile photos to allow us to provide you with a user-friendly view of your connected client devices.
* **Network topology map.** This information depicts the connections between client devices you use and the Plume network access points serving Wi-Fi.
* **Network and connectivity status**. This information indicates the networking addresses of the devices and system used to communicate with Plume and the Internet along with the operating statistics of the Wi-Fi and Internet connections.
* **Data consumption from your devices, the Internet and Plume system interfaces**. This information includes the current and historical data transfer speeds and data amount consumed.
* **Plume Services statistics and logs.**We collect certain information to help us create statistics and optimize our Services. Such information includes your Internet service provider (“ISP”) name and Internet protocol (“IP”) address, ISP speeds and outages, Wi-Fi operating environment, mobility of devices within Plume, and Plume HomePass App usage stats (e.g., number of features used or screen views). We also collect log information such as messages from the Plume pods regarding Plume connected devices, device inventory data, and software and hardware versions.
* **Safety controls and Internet security features.**Safety controls and Internet security features require the monitoring of device network traffic like source and destination traffic headers, IP addresses, ports, size and counts of transferred bytes and packets, applications consumed and DNS requests. If you are using the WiFi of someone while the safety controls and security features are On, note that the user of the Plume HomePass App may link the activity on your device to you, and see in the Plume HomePass App information about your use of the WiFi, such as whether your device is currently connected to the WiFi, how long it has been connected, any blocked domain name that you tried to access, and the time when you tried to access it.
* **Crash reports.** We collect crash reports for the Plume Software, the Plume HomePass App and the Plume WorkPass App. These reports can include information such as the type of crash, the software version you are running and the operating system version of the device running the Plume HomePass or WorkPass App.

**When you use HomePass, we may also automatically collect the following information:**

* **Motion at home.** We collect this information for the Plume HomePass App. The information collected is regarding disruptions in WiFi waves in the periphery of Plume network access points and devices connected to the Plume network to provide you with visuals of the live motion and motion history in your home.
* **Digital wellbeing related features**. We collect this information for the Plume HomePass App. Digital wellbeing requires collection of device network traffic metadata about time spent online using various Internet applications.

**When you use WorkPass, we may also automatically collect the following information:**

* **Captive Portal and Guest Analytics**. We collect this information for the Plume WorkPass App from guests of the small business. We may receive guests’ first and last name, email, city, country, year of birth, gender, phone number, profile photo and social media handle to process guest sign-in before Wi-Fi network access is granted and allow the business owner to know who is connecting to the Wi-Fi network at a small business location.

**2. HOW WE USE PERSONAL INFORMATION**

We process your Personal Information for the following purposes:

* To operate and provide you with our Services and fulfill our contract with you, for example if you make a purchase from us or otherwise use our Services. This may include creating your account, verifying your identity, taking payments, communicating with you, providing customer support, arranging the delivery or other provision of products and services, better identifying your devices to more accurately represent your devices in the Plume HomePass App, providing more accurate security threat identification, providing you with more visibility into your distributed network, providing reports that help you better understand your network bandwidth and the devices that are consuming network resources, scheduling network optimizations, firmware updates and internet freeze for your devices, presenting you with live motion visuals and motion history, providing you with visibility and control over time spent by users on various Internet applications, alerting you of malicious Internet locations or websites and content that has been identified as inappropriate in accordance with the content filters set by the Plume HomePass App user, preventing home devices from being hacked, app reporting and analytics, and identifying device behavior that may indicate an anomaly or attack.
* To enable our business in accordance with our legitimate interests, in particular:
	+ we monitor use of our Services and may use your Personal Information to help us analyze, troubleshoot, protect, improve and further develop our Services and other products and services;
	+ we may send you marketing messages about our or third-party products and services (you may opt out to receiving such messages as set out in section 7 of this Policy);
	+ we may use your Personal Information to tailor our Services to you;
	+ we may use your Personal Information to invite you to take part in market research and testing of new features or products and to conduct these activities;
	+ we may de-identify information collected about your use of our Services to create statistical analysis and aggregated reports to identify trends;
	+ we may use your Personal Information to prevent fraud (e.g., if you provide a credit or debit card, we may use third parties to check the validity of the sort code, account number and card number you submit); and
	+ we may monitor any customer account to enforce the Plume Terms of Use and to prevent, investigate and/or report security incidents, crime, fraud or misrepresentation, all in accordance with applicable law.
* With your consent, where appropriate or required by applicable law, such as for certain marketing activities and advertising practices.
* To comply with applicable laws and protect our business interests and legal rights in connection with legal claims, compliance, regulatory and investigative purposes. For example, we may access, use, preserve, transfer, or disclose, at any time, your Personal Information as reasonably necessary:
* To comply with any applicable law, regulation, subpoena, legal process or litigation, or respond to any governmental requests or regulatory investigation and to cooperate with law enforcement, if we believe such action is required or permitted by law;
* To enforce this Policy or the Plume Terms of Use including investigating any potential violations;
* To protect the safety, integrity, rights, or security of our users, our Services or equipment, or any third party; and
* To detect, prevent, or otherwise address fraud, security, or technical issues related to our Services or those of our business customers.
* To provide our Services to our business customers, including small business customers, on whose behalf we may process Personal Information. To learn more about the processing of your Personal Information in this context, please refer to the privacy policy of the relevant business customer.

**3. HOW WE DISCLOSE YOUR PERSONAL INFORMATION**

We may share your Personal Information under the following circumstances described below or otherwise disclosed to you at the time of collection:

* With our affiliates and subsidiaries, such as Plume’s entities in the U.S., Poland, Slovenia, Switzerland and Taiwan.
* With vendors that we have selected to provide us with services and process some Personal Information on our behalf to operate our Services (e.g., for Internet security and threat protection, motion detection, order fulfillment, email management, payment processing, data analytics, etc.). These companies are contractually obligated to safeguard any Personal Information they receive from us.
* We may share Personal Information with third parties with your express, affirmative consent. For example, you may give us permission to share Personal Information with others for marketing uses, authorize a third-party web client or application to access your account, or ask us to share your feedback with a business.
* We may share Personal Information with data analytics providers.
* If you acquired your Plume product from your Internet service provider, we may share your Personal Information with that Internet service provider.
* If we believe that disclosure is reasonably necessary to comply with a law, regulation, valid legal process (e.g., subpoenas or warrants served on us), or governmental or regulatory request, to enforce or apply the Terms of Use, to protect the security or integrity of the Plume Services, and/or to protect the legitimate interests, rights, property, or safety of Plume, its employees, users, or others.
* We may share or transfer Personal Information as part of a business deal such as the financing, sale, merger, bankruptcy, sale of assets or reorganization of our company.
* We may share Personal Information with our business customers when we process it on their behalf.
* We may share Personal Information with other third parties for whom we have obtained your permission to disclose your Personal Information.

We also may de-identify and aggregate your Personal Information to share it with partners and the public in a variety of ways, such as by providing research reports about Wi-Fi usage. When we provide this information, we perform appropriate procedures so that the information does not identify you and we contractually prohibit recipients of the information from trying to re-identify you.

**4. DATA RETENTION**

We take measures to retain your Personal Information for the period necessary to fulfill the purposes outlined in this Policy unless a longer retention period is required or permitted by law. Please note that we have a variety of obligations to retain your Personal Information, including to ensure that transactions can be appropriately processed, settled, refunded or charged-back, to help our service providers handle their obligations, and to comply with laws and regulations. Accordingly, we may retain your Personal Information even after you’ve closed your Plume Account to meet our obligations. When determining the retention period, we take into account various criteria, such as the type of products and services requested by or provided to you, the nature and length of our relationship with you, possible re-enrollment with our Services, the impact on the Services we provide to you if we delete some information from or about you, mandatory retention periods provided by law and the statute of limitations.

**5. CHILDREN’S PRIVACY**

Plume’s services are not directed to children, and Plume does not knowingly collect information from children under the age of 13. If you learn that a child has provided us with Personal Information in violation of this Policy, then you may alert us at privacy@plume.com.

**6. DATA SECURITY**

Plume uses a combination of technical and administrative security controls designed to maintain the security of your Personal Information and protect it against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the Personal Information in our possession. We use commercially reasonable physical, administrative, and technological methods to transmit your Personal Information securely and store your Personal Information using Amazon’s Cloud Services. However, as our Services are hosted electronically, Plume can make no guarantees as to the security or privacy of your Personal Information.

**7. YOUR RIGHTS AND CHOICES**

Depending on your jurisdiction and as otherwise provided by law, you may have certain rights regarding the Personal Information we maintain about you and certain choices about what Personal Information we collect from you, how we use it, and how we communicate with you:

* **Marketing opt out.**You can opt out of receiving regular summaries, contests, giveaways, surveys and promotional emails by following the instructions contained in our marketing communications. Opting out of these promotional emails will not end transmission of administrative services-related emails that are required to use our Services.
* **Profile settings.**You may assign nicknames to your network access points and devices and may create person profiles with profile nicknames and photos. You may assign personal devices to these profiles, using the device network addresses.
* **Internet security controls.**You may configure policies for security protection, schedules, parental controls, or content filters through your settings. You may disable some of these security features for some or all home devices at any time through your settings, which will prohibit the monitoring and collection of device network traffic for this purpose.
* **Motion detection settings.**You can disable the motion detection features that allow you to view live motion and motion history through your settings, in which case we will no longer receive visuals of and information about the live motion around network access points.
* **Digital wellbeing related features**. You can disable the digital wellbeing features for some or all home devices through your settings, in which case we will no longer receive device network traffic metadata about time spent online using various Internet applications.
* **Account deactivation.**You can deactivate your Plume account at any time by contacting Customer Support.
* **Opt out from cookies.**Most Internet browsers automatically accept cookies, but you may be able to change the settings of your browser to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you set your browser to reject cookies, parts of our website may not work for you. Additionally, some of our advertising partners are members of the Network Advertising Initiative or the Digital Advertising Alliance. If you prefer to not receive targeted advertising, you may be able to opt out of some network advertising programs by visiting the Digital Advertising Alliance Opt-Out Page (http://optout.aboutads.info/?c=2&lang=EN) and the Network Advertising Initiative Opt-Out Page (http://optout.networkadvertising.org/?c=1#!/). Please note, depending on your type of device or browser, it may not be possible to delete or disable all cookies and similar technologies on your device. Your selection of the “Do Not Track” option provided by your browser may not have any effect on our collection of cookie information for analytic and internal purposes, as we do not respond to Do Not Track signals.
* **European Privacy Rights.**If you are located in the European Economic Area (“EEA”), Switzerland, or the UK, you are entitled to reach out to us via the contact details in this Policy and ask us for an overview of your Personal Information or ask for a copy of your Personal Information stored in the Plume Cloud. In addition, you may request us to update and correct inaccuracies, delete your Personal Information, restrict processing of your Personal Information, or exercise your right to data portability and to easily transfer your Personal Information to another company. In some cases, you may object to the processing of your Personal Information and where we have asked you for your consent to process your Personal Information, you can withdraw it at any time. We always enjoy hearing from you and appreciate your business. Should you nonetheless have unresolved concerns, you have the right to lodge a complaint with the supervisory authority of your residence, place of work or where the incident took place.

Please note that the rights described above are not absolute, and that your requests cannot always be met entirely. For example, under specific circumstances we may not be able to delete or restrict the processing of your Personal Information as we may have legal obligations or contractual obligations to keep certain information.

We will use commercially reasonable efforts to timely respond to any changes you request. Many such changes are accomplished using batch processing (i.e. collecting a number of similar change requests and making all such changes at once), so the changes may not be immediately effective but may take 30 days or longer. If you require a more immediate change to your Personal Information and are unable to make such a change using the available website resources, please contact us.

**8. CROSS-BORDER DATA TRANSFERS**

Our Services are hosted and operated in multiple geographic regions. Any Personal Information that we collect may be transferred, accessed and processed outside of your country. If you are located in the EEA, Switzerland, the UK, Canada, or other regions with laws governing the processing of Personal Information that may differ from U.S. law, please note that your Personal Information may be transferred to countries that do not have the same data protection laws as the country in which you initially provided the information.

We comply with applicable legal requirements providing adequate safeguards for the transfer of Personal Information to countries other than the country where you are located. In particular, we may transfer Personal Information to countries for which adequacy decisions have been issued by the European Commission or use contractual protections for the transfer of Personal Information to third parties, such as the European Commission’s Standard Contractual Clauses. You may contact us to obtain a copy of the safeguards we use to transfer Personal Information outside the EEA, Switzerland, or the UK.

**9. CHANGES TO THIS POLICY**

Because we’re always innovating and finding new ways to improve the Wi-Fi and in-home digital experience for our users, this Policy may change over time. We will post the new Policy online and we will change the “Last Updated” date. You should consult this Policy regularly for any changes. If we materially change the ways in which we use or share information from or about you or your devices previously collected from you through the Services, we will make reasonable efforts to notify you of the changes by sending a notice to the primary email address provided to us and/or by placing a notice on our Services.

**10. HOW TO CONTACT US**

The entity responsible for the processing of your Personal Information is Plume Design, Inc., unless we are acting on behalf of one of our business customers. If you have questions or comments about this Policy or our privacy practices, please contact us at privacy@plume.com or at: