

Last Updated: September 15, 2016

Winplus North America, Inc. (“**Winplus**,” “**we**,” “**our**,” or “**us**”.) designs smart products to enhance the personalization of vehicle lighting. Winplus respects your preferences concerning the treatment of information that we may collect. This Privacy Policy explains our practices regarding the collection, use, and disclosure of information that we receive through our Type S LED services, which are accessible via our mobile device application (the “**App**”). Our mobile services, the App, and our website located at www.winplususa.com (the “**Site**”) are called the “**Services**.” This Privacy Policy does not apply to any third-party websites, services, or applications, including those accessible through any of our Services.

1. REVISIONS TO THIS PRIVACY POLICY

ANY INFORMATION THAT IS COLLECTED THROUGH OUR SERVICES IS COVERED BY THE PRIVACY POLICY IN EFFECT AT THE TIME SUCH INFORMATION IS COLLECTED. WE MAY REVISE THIS PRIVACY POLICY FROM TIME TO TIME. IF WE MAKE ANY MATERIAL CHANGES TO THIS PRIVACY POLICY, INCLUDING ANY CHANGE THAT WE PROPOSE THAT WILL HAVE RETROACTIVE EFFECT, WE’LL NOTIFY YOU OF THOSE CHANGES BY POSTING THEM ON THE SERVICES OR BY SENDING YOU A NOTIFICATION, AND WE’LL UPDATE THE “LAST UPDATED DATE” ABOVE TO INDICATE WHEN THOSE CHANGES WERE MADE. PLEASE NOTE: IF YOU OR, AS APPLICABLE, YOUR LEGAL GUARDIAN, DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MAY NOT INSTALL, ACCESS AND/OR USE THE APPS AND YOU ARE REQUESTED TO PROMPTLY ERASE THEM, AND ANY PART THEREOF, FROM YOUR MOBILE DEVICE.

2. COLLECTION AND USE OF INFORMATION

a. What kind of Data is Collected

We do not collect Personally Identifiable Information (“**PII**”). We do, however, collect Non-Personal Information (“**NPI**”). The NPI is collected for the purpose of monitoring and improving Services and providing push notification to users through third-party service providers. The following permissions accessed for NPI collection are detailed below:

- i.** Device & App History -
NPI is collected to identify the uniqueness of the device to ensure the accuracy of push notification application.
- ii.** Location
Location data is collected for the purpose of sending push notifications appropriately to users located in certain geographical areas.
- iii.** Photos/Media/Files
The only data types collected from this permission are the App list & App version, the purpose is to monitor retention rate of App use.
- iv.** Wi-Fi connection information
Application networking status is collected for the purpose of sending push notifications in real time.
- v.** Bluetooth connection information
Bluetooth is only used to communicate between the App and the Smart Hub to control product settings.

vi. Device ID & call information

Unique device ID is collected to count and monitor individual device installations and related metrics to ensure App is performing satisfactorily.

b. How Collected Information is Stored

We do not store collected NPI. Any NPI data is collected through third party service providers in accordance with the standards of data collection as detailed above.

3. INFORMATION SHARED WITH THIRD PARTIES

a. Information Shared with Our Services Providers.

We may engage third party service providers to work with us to administer and provide the Services. These third party service providers have access to NPI only for the purpose of performing services on our behalf.

b. Information Shared with Third Parties.

We may share aggregated information and non-identifying information with third parties for research and analysis, demographic profiling, and other similar purposes. This information does not include your PII.

c. Information Disclosed in Connection with Business Transactions.

Information that we collect from our users is considered to be a business asset. Thus, if we are acquired by a third party as a result of a transaction such as a merger, acquisition, or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets may be disclosed or transferred to a third-party acquirer in connection with the transaction.

d. Information Disclosed for Our Protection and the Protection of Others.

We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you that is in our possession or control to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (a) to respond to claims, legal process (including subpoenas); (b) to protect our property, rights, and safety and the property, rights, and safety of a third party or the public in general; and (c) to identify and stop any activity that we consider illegal, unethical, or legally actionable activity.

4. KEEPING YOUR INFORMATION

Following termination or uninstallation of your App, Winplus, its clients, affiliates, or service providers may retain information for a commercially reasonable time period for backup, archival, and/or audit purposes. If you have any questions about termination or uninstallation, please contact us directly at winplusdevelop@gmail.com.

5. THE SECURITY OF YOUR INFORMATION

We take appropriate administrative, physical, and electronic measures designed to protect the information that we collect from or about you or your authorized child from accidental or unlawful destruction, accidental loss or unauthorized access, use, modification, interference, or disclosure. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

6. LINKS TO OTHER SITES

Our Services may contain links to websites and services that are owned or operated by third parties (each, a “**Third Party Service**”). Any information that you provide on or to a Third Party Service or that is collected by a Third Party Service (including Google, Facebook) is provided directly to the owner or operator of the Third Party Service and is subject to the owner’s or operator’s privacy policy. We’re not responsible for the content, privacy, or security practices and policies of any Third Party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third Party Service that you access through our Services.

7. Questions?

Please contact us at winplusdevelop@gmail.com if you have any questions about our Privacy Policy, or if you wish to make a complaint about our collection or use of information under this Privacy Policy. We will use our reasonable endeavors to address any complaint you may have as soon as possible.