

CopperTree Analytics - Privacy Policy

CopperTree Analytics (“CopperTree”, “we”, “us”) is committed to protecting the privacy of all individuals whose personal information we collect and process. This Privacy Policy explains what personal information we collect, how we use and share it, and the rights individuals have regarding their information.

Scope and Relationship to Other Documents

This Privacy Policy describes how CopperTree handles *personal information* when you visit our websites, interact with us, or use our Kaizen software-as-a-service (“SaaS”) platform and related services.

It does not govern ownership, retention, or use of non-personal Operational Data - such as building automation system (BAS) data, equipment data, meter readings, trend logs, CMMS data, or other similar client-supplied operational information (“Operational Data”). Those topics are covered in:

- the CopperTree Service Use Agreement; and
- the CopperTree Data Ownership & Retention Policy.

Where this Policy conflicts with a written agreement between CopperTree and a customer, that written agreement will prevail to the extent of the conflict. This Privacy Policy does not create warranties or obligations beyond those described in the Service Use Agreement.

1. Definitions

Personal Information

Information relating to an identified or identifiable individual. This may include name, business contact details, user account information, device identifiers, and information about how a user interacts with our websites or services.

Processing

Any operation performed on Personal Information, including collection, storage, use, disclosure, or deletion.

Operational Data

Non-personal operational data provided by the Customer or collected from the Customer’s environment for the purpose of delivering analytics, insights, monitoring, or other Services. This includes BAS data, trend logs, sensor values, setpoints, alarms, device and system metadata, meter data, imported files, CMMS information, digital twin inputs, and other similar operational data. Operational Data expressly excludes Personal Data / Personal Information.

Controller / Processor

CopperTree acts as a data processor for Operational Data within the SaaS Platform, and as a

data controller for the limited Personal Information we collect through our website or for account administration, support, and communications.

2. How We Collect Personal Information

We collect personal information in two ways:

1. Information you provide directly, and
2. Information collected automatically when you interact with our website or applications.

2.1 Information You Provide

May include:

- Full name, job title, and company affiliation
- Email address and phone number
- Business address
- Account credentials (email + password)
- Information submitted through website forms, onboarding forms, or IT/network requirement forms
- Optional signatures provided for support or documentation purposes

Only your **name and email address** are required to create a Kaizen user account.

2.2 Information Collected Automatically

When you access our website or online services, we may collect:

- IP address
- Browser type, device type, operating system
- Referring site, pages visited, time spent
- Interaction data and general analytics

This information supports security, performance, and usability improvements.

3. How We Use Personal Information

We use personal information to:

- Create and manage user accounts in Kaizen
- Provide customer support, onboarding, and technical services
- Deliver product updates, release notes, and service communications
- Contact you regarding events, webinars, or CopperTree news
- Send product-related or promotional communications (you may opt out at any time)
- Analyze usage patterns and improve our website and services
- Comply with legal or contractual obligations

We do **not** use personal information to make decisions that have legal or significant effects. CopperTree does not make decisions about individuals that have legal or similarly significant

effects solely by automated means. We may use automated tools to help analyze usage patterns and improve our services, but a human is always involved in any decision that has a material effect on an individual.

4. Lawful Basis for Processing (GDPR / UK GDPR)

Where required, CopperTree processes personal information under the following lawful bases:

- **Contract performance:** to deliver access to Kaizen and related services
- **Legitimate interests:** to operate, secure, and improve our products and communications
- **Consent:** for certain marketing communications
- **Legal obligation:** when required to comply with applicable laws

5. Cookies and Tracking Technologies

We use cookies and similar technologies for service functionality, analytics, and communication.

5.1 Essential & Functional Cookies (Kaizen Platform)

Used to authenticate users, store preferences, and support account and platform security.

5.2 Analytics & Marketing Cookies (Corporate Website)

Used to understand visitor behavior, improve content, and support marketing activities.

5.3 Email Web Beacons

Marketing emails may include tracking pixels to measure engagement and improve communication relevance.

Your Choices

- You may disable non-essential cookies through your browser settings.
- On our website, where required, you may manage analytics and marketing cookies through the cookie banner or preferences tool presented to you.
- You may unsubscribe from marketing emails at any time by using the link in the email or by contacting us.

6. How We Share Personal Information

CopperTree does **not sell** personal information and does **not share** Personal Information for cross-context behavioral advertising, as those terms are defined under applicable privacy laws.

We may share personal information with:

6.1 Service Providers

Trusted third parties who support cloud hosting, email delivery, analytics, CRM systems, and customer support tools. These providers are contractually bound to confidentiality and may not use personal information for their own purposes.

6.2 Legal Requirements

We may disclose information when required to comply with applicable laws, regulations, or legal processes.

CopperTree does not share Customer Data with third parties except where necessary to provide contracted services.

7. International Transfers

Customer Data is hosted in CopperTree's cloud infrastructure and may be accessed by authorized CopperTree personnel from other countries for support, operations, security, and other legitimate business purposes. Where CopperTree has expressly agreed in writing to host Customer Data in a specific geographic region, it will not intentionally change the primary hosting location except as required by law or for disaster recovery and backup purposes.

8. Data Retention

CopperTree retains personal information only as long as necessary to:

- Provide our services
- Fulfill the purposes described in this Policy
- Meet contractual or legal obligations

Retention practices for Operational Data processed in the SaaS Platform follow CopperTree's Data Ownership & Retention Policy referenced in the Service Use Agreement. That policy describes how long Operational Data is retained in active systems and backups, and how it is deleted or anonymized after the end of a subscription or applicable retention period.

9. Data Security

We use administrative, technical, and physical controls to protect personal information, including:

- Encryption in transit and at rest
- Role-based and Attribute-based access controls
- Multi-factor authentication for administrative access
- Logging and monitoring
- Secure development practices
- Review of third-party service providers

Although no system is entirely secure, CopperTree uses reasonable measures to reduce risks of unauthorized access, loss, or misuse.

10. Children's Privacy

Our services are not intended for individuals under the age of 16, and we do not knowingly collect personal information from children. If such information is discovered, it will be deleted promptly.

11. Your Privacy Rights

Depending on your jurisdiction, you may have rights to:

- Access your personal information
- Correct inaccuracies
- Request deletion
- Restrict processing
- Object to processing (including marketing)
- Withdraw consent
- Request data portability
- Ensure decisions are made by humans rather than automated systems

To exercise these rights, please contact us.

12. How to Contact Us

For questions or to exercise your privacy rights, please contact our Privacy Officer:

Email: privacy@coppertreeanalytics.com

Phone: +1-604-575-5943

Toll-free: +1-855-575-5943

13. Changes to This Privacy Policy

CopperTree may update or modify this Privacy Policy at any time. Any updates become effective upon publication or other communication by CopperTree. Your continued use of the Services after an update becomes effective constitutes your acceptance of the updated Privacy Policy. Customers are encouraged to review this Privacy Policy periodically to stay informed of the current terms.

Last Updated: December 2025