

## Growlink Privacy Policy

Last Updated: July 25, 2025

Growlink, Inc. (“Growlink”, “we”, “us”, or “our”) is committed to protecting the privacy of individuals who visit our websites, use our products and services, or otherwise interact with us. This Privacy Policy outlines how we collect, use, disclose, and safeguard personal data, and the rights and choices you have regarding your information.

This Privacy Policy applies to:

- Visitors to Growlink websites and users of our software and services;
- Customers and prospective customers;
- Individuals whose personal data is provided to us in connection with the use of Growlink’s products or services.

Where applicable, Growlink acts as:

1. **A Controller**, when we collect and use your personal data for our own purposes, such as product delivery, marketing, and account management;
2. **A Processor**, when we process personal data on behalf of our customers through the Growlink platform.

### 1. Information We Collect

We may collect the following categories of personal data:

- **Contact Information:** Name, email address, phone number, job title, business name, and mailing address.
- **Account and Subscription Data:** Login credentials, subscription plan, device data, Growlink controller usage data, and in-app preferences.
- **Billing Information:** Payment method, billing contact, and transaction history.
- **Usage and Device Data:** IP address, browser type, operating system, device identifiers, and interaction logs within Growlink products.
- **Support Interactions:** Transcripts, recordings, and notes from customer support, advisory, or onboarding sessions.
- **Third-Party Data:** Data provided by authorized partners, integrators, or publicly available sources.
- **Sensor and Growlink OS Data:** Data generated by connected controllers, sensors, or automation routines, which may include environmental, system performance, and operational metrics.

### 2. How We Use Personal Data

We use personal data for the following purposes:

- **Service Delivery:** To provide, configure, and maintain Growlink hardware, software, and services.

- **Customer Support:** To troubleshoot, train, and assist customers and users.
- **Product Improvement:** To analyze usage data, identify trends, and enhance product functionality, including development of AI features.
- **Marketing and Communications:** To promote Growlink products and services. You may opt out of non-transactional communications at any time.
- **Security and Compliance:** To detect fraud, enforce terms, comply with legal obligations, and protect rights.

### 3. Legal Basis for Processing

For individuals in the EEA or UK, Growlink processes personal data based on:

- Performance of a contract;
- Consent (e.g., for marketing emails);
- Compliance with legal obligations;
- Legitimate interests, balanced with individual rights.

### 4. Data Sharing and Disclosure

We may share personal data with:

- **Service Providers:** Vendors that assist with billing, hosting, customer support, analytics, or marketing.
- **Distributors and Channel Partners:** To support sales, installation, or service.
- **Third-Party Integrations:** At the customer's direction (e.g., TrolMaster, Agrowtek, or Aroya integrations).
- **Legal or Regulatory Authorities:** As required by law or to protect Growlink's rights.
- **Successors:** In connection with a merger, sale, or acquisition.

### 5. International Transfers

Growlink is based in the United States. If you access our services from outside the U.S., your data may be transferred to and processed in the U.S. or other countries where our service providers operate, subject to appropriate safeguards.

### 6. Data Security and Retention

Growlink uses industry-standard technical and organizational measures to protect personal data, including encryption, access controls, and monitoring. We retain personal data only as long as necessary for the purposes outlined in this Policy or as required by law.

### 7. Cookies and Tracking Technologies

Growlink uses cookies, pixels, and similar technologies for functionality, analytics, and marketing purposes. You can manage cookie preferences in your browser settings. For more, see our Cookie Policy (linked here when available).

## **8. Your Rights and Choices**

Subject to applicable law, you may have the following rights:

- Access to your personal data;
- Request correction or deletion;
- Object to processing or request restriction;
- Withdraw consent (where processing is based on consent);
- Lodge a complaint with a supervisory authority.

To exercise these rights, email: [privacy@growlink.com](mailto:privacy@growlink.com) or submit a request via [Growlink's Privacy Request Form] (link when ready).

## **9. California Privacy Rights**

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA), including the right to know, access, delete, correct, or opt-out of the sale or sharing of personal data.

Growlink does not sell personal data and does not knowingly collect data from individuals under the age of 16.

## **10. Children's Privacy**

Growlink products and services are intended for business use and are not directed at children under 16. We do not knowingly collect personal data from children.

## **11. Changes to This Policy**

We may update this Privacy Policy from time to time. We will notify you of material changes via email or in-product notice. The "Last Updated" date reflects the effective date of the current version.

## **12. Contact Us**

If you have questions or concerns about this Privacy Policy or our data practices, contact us at:

**Growlink, Inc.**

Attn: Privacy Officer

Growlink Inc

Email: [privacy@growlink.com](mailto:privacy@growlink.com)