



TRUSTe LLC Independent GDPR Privacy Practices Compliance Validation Findings Summary

Expiration Date: July 23rd, 2020

Scope

TRUSTe LLC¹ has reviewed the IoT Product Line (including Tuya IoT platform, Tuya Cloud, Tuya Smart App, Smart Life App, other OEM branded App, and Tuya API/SDK) of Tuya Inc. (“Organization”) as of July 24th, 2019 against the 44 GDPR Privacy Practices Management Validation Requirements (the “Validation Requirements”) comprising the TrustArc GDPR Privacy Practices Management Compliance Validation. A validation review of the Organization’s GDPR Privacy Practices involves a comprehensive evaluation of practice-level measures and evidence of those measures to ensure that the processing of personal information conducted by them, or by a third-party processor on their behalf, is performed in compliance with the EU General Data Protection Regulation (GDPR).

Inherent Limitations

Because of their nature and inherent limitations, practices-level measures of the Organization may not always operate effectively to meet the applicable Validation Requirements. Furthermore, our findings herein are subject to the risk that the Privacy Practices, or any component of the Organization’s practices, may change or that practice-level measures implemented by the Organization may become ineffective or fail.

Findings

In our opinion, in all material respects, based on the descriptions and supporting evidence of practices-level measures identified in Tuya Inc.’s GDPR Validation Assessment:

- The applicable practices-level measures as further described in the accompanying TRUSTe Validation Report have been implemented as of July 24th, 2019.
- The measures described in the GDPR Validation Assessment were suitably designed to provide reasonable assurance that the Validation Requirements would be met if the practices-level measures operated effectively as of July 24th, 2019.

Restricted Use

This summary² of the Findings Letter and accompanying report is for the intended use of Tuya Inc. as of July 24th, 2019.

- This summary provided by TRUSTe may be used by the Organization until its expiration date listed below.
- This summary expires on July 23rd, 2020. It is not intended to be, and should not be used nor relied upon by anyone other than the Organization and, as determined in the sole discretion of the Organization, the Organization’s customers, contractors and other permitted stakeholders.

¹ TRUSTe LLC is an independent subsidiary of TrustArc Inc.

² This summary is solely an abbreviated unofficial version of the full Findings Letter and accompanying report. It is intended solely for the Organization to display on its website. No modifications to this document are permitted and shall render it invalid. Only the full Findings Letter and report represent the official determination of TRUSTe.