# **Privacy Policy**

Privacy Policy

*Last updated: 16 November, 2022*

This Privacy Policy explains how Yunjing Intelligence Innovation (Shenzhen) Co., Ltd. and its affiliated companies (“we,” “our,” “us” or “Narwal”) collect, use, and share the personal information about you or associated with you (“personal information” or “personal data”).

This Privacy Policy applies to our websites, including narwal.com and all related pages and subdomains (collectively, the “Website”), as well as to consumer devices (“Robot Device”) you register, to our mobile applications (“App” singular, “APPs” plural) which provide support for those Robots (collectively, our “Service”), and to your non public interactions with Narwal (e.g., via opening a help/feedback ticket). By continuing to use our Website, or using our Service, you agree to the terms of this Privacy Policy.

1. What Types of Personal Information Do We Collect?

Information You Give Us. You may give us information by signing up for an online account, entering information through our online forms or surveys, contacting us through our website chat function, shop online, contacting us by phone or email for information or customer service, provide us with comments and reviews on our Website, or otherwise use our Service. If you register your Robot online or through another registration means, we also collect information about your Robot, such as the Robot ID, serial number. You acknowledge that Narwal cannot guarantee the privacy of personal information you choose to post publicly on the internet, including on Narwal’s website or social pages. When possible, directly identifiable personal information (such as full name and email address) is stored with encryption solution, with access restricted to need-to-know.

The categories of information you may give us include (see Table 1 for more detailed information about the categories of personal information we may collect form you and your devices, and how we may use that information):

* Contact information, such as name, address, email, and telephone number;
* Online and device identifiers, such as IP address, MAC address, cookies;
* Account information, such as username, profile photo, account ID and password;
* Purchase and transaction information, such as products purchased;
* Payment and billing information, such as credit card information, your billing address and purchase history.

Information We Automatically Collect. Like many website and mobile application operators, we collect information that your browser sends whenever you visit our website or use our mobile applications.

This includes log data, such as your device’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages and other statistics. This information may be collected via several technologies, including cookies, web beacons, clear GIFs, canvas fingerprinting, and other means, such as Google Remarketing and Facebook Pixel.

You can control cookies in your browser to enable or disable them. Learn more in our [**Cookie Policy**](https://shop.narwal.com/pages/narwal-cookie-policy).

Information We Collect Through Our Robot Devices. Our robot devices collect information in order to function properly. For example, the robot collects information about your WIFI network in order to connect and function wirelessly. Additionally, the robot collects environment information. This is information about the robot’s movement throughout the environment it is cleaning, which is necessary to create a “location map” of the robot’s domain, and includes the existence of objects or obstacles encountered on its cleaning route. For mobile and web users, SDKs embedded in our App and our Website are set out in Table 2, and the device permissions we will request from you, when it is necessary, are set out in Table 3. If you share your robot device with other users (the “Device Sharing”), in which case you will be the Main Account Holder and other users you invited or approved to have joint control over the robot device will be the Sub Account Holders, the information your robot device collect will also be shared with Sub Account Holders.

Information We Collect from Third Parties. If you access our Website through third parties (e.g., Facebook or Google), or if you share content from our Website to a third-party social media service, the third-party service will send us certain information about you if the third-party service and your account settings with it allow such sharing: the information we receive will depend on the policies and your account settings with the third-party service. You should always review and, if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our Service.

2. How Do We Use Personal Information?

We use your personal information as follows (see Table 1 for more detailed information about the categories of personal information we may collect form you and your devices, and how we may use that information):

* To provide you with our products and services, including for your purchase and use of our Robot Devices and associated mobile applications;
* To market our products and/or services to you;
* With respect to website cookies, to share with third-party marketing partners to provide tailored advertising on our Website and other websites that you may visit;
* To analyze service usage and improve the services offered;
* For market research, project planning, and troubleshooting problems;
* For detecting and protecting against errors, fraud, or other criminal activity.

3. How Do We Share Personal Information?

Affiliates. We share your information with our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Policy.

Service Providers. Vendors, affiliates, and other service providers that perform services on our behalf, solely in order to carry out their work for us, which may include identifying and serving targeted advertisements, providing e-commerce services, content or service fulfillment, billing, website operation, payment processing and authorization, customer service, delivery service, web hosting, data storage, or providing analytics services.

Third Party Marketing and Advertising Organizations. With respect to website cookies, we share your information with third party marketing and advertising partners to market our Services on our Website and other websites that you may visit. To learn more, please see our [**Cookie Policy**](https://shop.narwal.com/pages/narwal-cookie-policy).

Third Party Links and Websites. Our Website may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

Disclosures Required by Law. We may be required to disclose your data in response to lawful requests by public authorities, including to meet law enforcement requirements. We may be under a duty to disclose or share your personal information in order to comply with any legal obligation, to enforce or apply our terms and conditions and other agreements, to protect our rights, property, or safety, or to protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

4. How Do We Respond to ‘Do Not Track’ Signals?

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. We do not recognize or respond to browser-initiated DNT signals, as the internet industry is currently still working toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

5. Cookies and Other Technologies

To make our Website and services work properly, we sometimes place small data files called cookies on your device. A cookie is a small text file that a website or mobile application saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, shopping cart, or other preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another. To learn more, please see our [**Cookie Policy**](https://shop.narwal.com/pages/narwal-cookie-policy).

Google Analytics. We use Google Analytics. We use the information we get from Google Analytics only to improve this site. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Please refer to Google’s [**Privacy Policy**](https://policies.google.com/privacy) for more information. You may also choose to download the [**Google Analytics opt-out browser add-on**](https://support.google.com/analytics/answer/181881).

Google Ads/Facebook Pixel. We also use Google Ads and Facebook Pixel to deliver tailored advertising on our Website and other websites that you may visit. You can learn more about how to control advertising cookies by visiting the Network Advertising Initiative’s Consumer Opt-Out [**link**](https://optout.networkadvertising.org/?c=1), the DAA’s Consumer Opt-Out [**link**](https://optout.aboutads.info/?c=2&lang=EN) for browsers, or the DAA’s opt-out [**link**](https://youradchoices.com/AppChoices) for mobile devices. Please note that electing to opt-out will not stop advertising from appearing in your browser or applications and may make the ads you see less relevant to your interests.

6. Your Privacy Choices

Please contact us using the contact details provided in the “Contact Information” section below if you would like to request access and/or make any changes to your personal information.

Marketing Opt-Out: We may use your personal information to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send, or you can contact us using the contact details provided in the “Contact Information” section below. You will still continue to receive service-related messages concerning products and services you have purchased (unless we have indicated otherwise).

Exercising Your Privacy Rights. We have listed the privacy rights for several jurisdictions below, but we understand you may have additional rights in your jurisdiction. You may contact us directly at any time about exercising your data protection rights. We will consider your request in accordance with applicable laws. To cancel your Narwal account, you can either contact us using the contact details provided in the “Contact Information” section below, or simply click the “Cancel Account” in “Account Information” through your App or the Website.

California Privacy Rights

If you are a California consumer, you have the following rights under the California Consumer Privacy Act of 2018 (CCPA):

* The right to know what personal information is being collected about you.
* The right to know whether your personal information is sold or disclosed and to whom.
* The right to say no to the sale of personal information.
* The right to access your personal information.
* The right, in certain circumstances, to delete the information you have provided to us.
* The right to equal service and price, even if you exercise your privacy rights.

Request for Information and Deletion (CCPA). California consumers have the right to request, up to twice in a 12-month period, that a business that collects personal information about the consumer disclose to the consumer the information listed below for the preceding 12 months. We have the right to request verification of your identity for all requests for information.

(1) The categories of personal information it has collected about that consumer.

(2) The categories of sources from which the personal information is collected.

(3) The business or commercial purpose for collecting or selling personal information.

(4) The categories of third parties with whom the business shares personal information.

(5) The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.

(6) The categories of personal information that the business disclosed about the consumer for a business purpose.

(7) The specific pieces of personal information it has collected about that consumer.

To make such a request, please email us at legal@narwal.com or call us at the following toll-free number *1-866-939-2153.*

Do Not Sell My Personal Information (CCPA). California consumers have the right to opt out of the sale of the consumer’s personal information. We do not sell your personal data to third parties. However, under the CCPA, some sharing of personal information necessary to provide you with personalized ads may be considered a “sale,” even if no money is exchanged, such as our use of Facebook Pixel and similar technologies. You may learn more about how to opt out of such personalized ads through our [**Cookie Policy**](https://shop.narwal.com/pages/narwal-cookie-policy).

Third Party Marketing. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information to third parties for the third parties’ direct marketing purposes. To make such a request, please contact us using the contact details provided in the “Contact Information” section below.

7. Legal Bases for Processing (EEA and UK Individuals)

If you are from the European Economic Area or United Kingdom, our legal bases for collecting and using your personal information is as follows:

* The performance of your contract or to enter into the contract and to take action on your requests. For example, the processing of your account registration, providing information on your purchases, providing our robot consumer services.
* Our legitimate business interests. For example, fraud prevention, maintaining the security of our network and services, direct marketing to you, and improvement of our services.
* Compliance with a mandatory legal obligation. For example, accounting and tax requirements, which are subject to mandatory retention periods. We may also collect your personal information to record your requests to exercise your rights and to verify your identity for such requests.
* Consent you provide where we do not rely on another legal basis. Consent may be withdrawn at any time.
* In some limited cases, we may also have a legal obligation to collect personal information from you, in response to lawful requests by public authorities, including to meet law enforcement requirements, as described above in “How Do We Share Personal Information?”.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the “Contact Information” section below.

8. EEA or UK Individuals’ Rights

If you are from the European Economic Area or United Kingdom, you have the right, under certain circumstances, to:

* Access your personal information;
* Correct inaccurate personal information;
* Request erasure of your personal information without undue delay;
* Request the restricted processing of your personal information;
* Request portability of the personal information that you have given us; and
* To object to the processing of your personal information.

If you are from the European Economic Area, you also have the right to lodge a complaint with a supervisory authority, under certain circumstances.

You may contact us using the contact details provided in the “Contact Information” section below for more information or to exercise your rights.

9. International Transfers of Data

Any data that you provide to us may be accessed, shared, and processed by our offices, located in China, and service providers located in China or other country/region.

This may entail a transfer of your personal information across international borders. The data protections standards may differ and be lower than the standards enforced in your jurisdiction.

We maintain appropriate safeguards as required by applicable law for any personal information transferred internationally, and, if required by applicable law, will seek your consent prior to such transfers.

10. Children’s Privacy

We understand the importance of safeguarding the personal data of children, and our Website, products, and services are not directed at individuals under the age of 16 or the equivalent age as specified by law in your jurisdiction. We do not knowingly collect personal information from children. If you become aware that a child has provided us with personal information, please contact us using the contact details provided in the “Contact Information” section below. If we become aware that a child has provided us with personal information, we will take steps to delete such information.

11. Change of Control

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization, or other change in control. If we sell, merge, or transfer any part of the business, part of the sale may include your personal information.

12. How Do We Protect Personal Information?

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. For example, when possible, we use encryption to transfer and store data. We further limit access to this data using access controls and confidentiality commitments.

However, no website, application, or transmission can guarantee security. Thus, while we have established and maintain what we believe to be reasonable procedures to protect the confidentiality, security, and integrity of personal information obtained through our Website, products, and services, we cannot ensure or warrant the security of any information you transmit to us.

We retain information from or about you or your devices as needed to accomplish the purposes identified in this Privacy Policy, and to meet legal requirements, including record retention, resolving disputes, and enforcing our agreements. Our retention of your personal information is governed by applicable law. This storage period may extend beyond the term of your relationship with us.

13. Policy Changes

We reserve the right to modify this Privacy Policy from time to time. We encourage you to periodically review this Privacy Policy to ensure you are familiar with the most current version.

14. Contact Information

If you wish to contact us or have any questions about or complaints in relation to this Privacy Policy, please contact us at the following contact details:

Email: **legal@narwal.com**

Toll-free number: 1-866-939-2153

Table 1: Personal Data We Collect and Use

| Category | Information We Collect and Use | Purposes |
| --- | --- | --- |
| Registration Information | Your Narwal ID, username, profile photo, email address, account password. | We use this information for your registration a Narwal account through our APP or Website. For Website users, you are able to browse our Website as a visitor without creating an account. |
| Contact Information | Your name, email address, physical address, phone number. | We use this information to contact you concerning orders, complaints, enquiry and requests. From time to time, we may use this information to send you important notices such as communications about purchases and changes to our terms, conditions and policies. |
| Purchase and Transaction Information | Order information (order number, product model, price, quantity), return and refund details, shopping cart details. | We use this information to fulfil or process orders, and to process returns and repairs. |
| Payment and Billing Information | Your billing address, name, phone number, email address, postal code, payment method and time, gift card numbers. | We use this information to fulfil or process orders, and to process returns and repairs.  We use this information to detect and prevent fraud. |
| App Usage Information | Device identifiers (such as MAC address/ IMEI/Android ID/IDFA/OpenUDID), IP address, Bluetooth information, Cookies. | We use this information in order for the robot device to be connected to local network, and to be bound with your account.  We use this information to present our Service to you on your device.  We use this information to determine products and services that may be of interest to you for marketing purposes.  We use this information to monitor and improve our Service and business, including diagnosing and fixing technology problems and developing new products and services. |
| Robot Device Information | Your local WIFI account, status, IP address, Serial Number (SN), Robot ID. | We use this information in order for the robot device t o be connected to local network, and to be bound with your account. |
| Robot Customization Settings and Preferences | Robot name, room names, zone names, and scheduled start/stop times, voice volume, “do not disturb” mode, “childproof lock”, screen brightness, cleaning plans, power of the mop, flop material. | We use this information to operate, maintain, and provide to you the features and functionality of the Service, and to tailor your settings of the device.  We use this information to develop new products and features available through our Service or otherwise improve our Service. |
| Robot Usage Information | Cleaning times and durations, bin empty events, tank refills, cleaning areas, cleaning route. | We use this information to inform you of cleaning report, and to inform when to change filters, side brushes and other accessories.  We use this information to monitor and improve our Service and business, including diagnosing and fixing technology problems and developing new products and services. |
| Robot Environment Information | The spaces where you use your Robot, such as floorplans, keep out zones and clean zones, types of objects (detected using the sensor on your Robot) along with its location, Robot device location within and near home, and a 2D cleaning environment map generated by the Robot. | We use this information to tailor our Service in particular by improving the quality of the map that is generated and used by your Robot to allow it to operate effectively, and to develop new products and features available through our Service. |
| Location Information | Approximate location such as the time zone in which your robot is located. | We use this information in order for the robot device to be connected to local network, and to be bound with your account. We will request your permission before we collect or track your location information. |
| Comments, chat and opinions | Content you provide to us when you contact us directly, such as the content of any text messages, webforms, or emails you send to us, or phone calls. | We use this information to provide customer service, including dealing with any enquiries or complaints.  We use this information to process returns or repairs.  We use this information to develop new products and features available through our Service or otherwise improve our Service. |
| Information received from third parties, such as social network. | If you connect a social network to our Service, or interact with us through a social network, we may receive information from the social network such as your name, your profile information and any other information you permit the social network to share with third parties. | We use this information to allow you log-in to the Service via third parties, and to tailor how the service is presented to you.  We use this information to communicate with you and respond to your requests or enquiries. |

Table 2: SDKs

| SDK | Third-Party SDK Provider | Type of Information Collected | Purposes | Privacy Policy |
| --- | --- | --- | --- | --- |
| Aurora J-push SDK | Shenzhen Hexun Huagu Information Technology Co.Ltd | Device Identifier（IMEI/IDFA, Android ID, IMSI, MAC, OAID）, Network Information（IP Address, Network Type and its name), Application Information（Notification Setting, Application Collapse Status, list of software), Device and system information (Type of device, model, and system and hardwares) | SDK Integration;  Push messages to users via App | [**极光 (jiguang.cn)**](https://www.jiguang.cn/en/license/privacy) |
| Firebase | Google Inc. | Cookies, GPS coordinates, WIFI Access Point, Data Base, Base Station, Bluetooth, Local Storage, IP Address, Mac Address, IDFA, IMEI(Android 12 or previous version) | SDK Integration;  Push messages to users via App, data analysis | [**Privacy Policy – Privacy & Terms – Google**](https://policies.google.com/privacy?hl=en) |
| Stripe SDK | Stripe, Inc | shipping address(Country two-letter code, state, city, detailed address, post code, name, email)  billing address( Country two-letter code, state, city, detail address, post code, name, email) | SDK Integration;  Collect Payment via Website | [**https://stripe.com/zh-cn-us/privacy**](https://stripe.com/zh-cn-us/privacy) |
| PayPal SDK | PayPal Pte. Ltd | shipping address（Country two-letter code, state, city, detail address, post code, name） | SDK Integration;  Collect Payment via Website | [**PayPal**](https://www.paypal.com/c2/webapps/mpp/ua/privacy-full?locale.x=en_C2) |
| AWS SDK | Amazon Web Services, Inc. | Files that users upload (which may include order information, name) | SDK Integration;  Enbale file uploads and downloads | [**AWS Privacy (amazon.com)**](https://aws.amazon.com/cn/privacy/?nc1=f_pr) |
| GetResponse | Beijing Chengmei Internet Technology Co.Ltd | Email address, order number, order status | API;  Send notice and marketing emails | [**GetResponse Privacy Policy**](https://www.getresponse.com/legal/privacy) |
| Besender system | Besender Inc | Order number, order information (email address, physical address) | API;  Process returns and repairs | / |
| Paybright | PayBright Inc. | Order number, price information | API;  Procss payment of the order | [**Privacy | Paybright**](https://paybright.com/en/privacy) |
| Baidu OCR | Beijing Baidu Wangxun Technology Co. Ltd | Device Identifier（IMEI/OAID, IMSI,MAC,Android ID）,Network Information（IP Address, Network Type and its name） | SDK integration;  Enables image character detection and recognition services | [**通用参考 - 文字识别在线SDK隐私政策 | 百度AI开放平台 (baidu.com)**](https://ai.baidu.com/ai-doc/REFERENCE/Jky9l49bk) |

Table 3: Device Permissions We Request or Use

In order to ensure stable function and safe operation of the Service, we may request or use relevant permissions of the operating system, as shown in the following table. Please note that for the functional and security needs of the service, we may also use third-party SDKs, and these SDKs may also request or use relevant operating system permissions. In the process of using our services, you may use H5 pages developed by us or third parties, and these H5 pages may also request or use permissions as necessary for business purposes.

| Android System | |
| --- | --- |
| Permission | Purposes |
| Camera | When you are interacting with us (online chatting), setting your profile photo, using screenshot to give us feedbacks, to provide such services we will request camera permissions from you in order to enable camera to take pictures. |
| Storage | When you are interacting with us (online chatting), setting your profile photo, using screenshot to give us feedbacks, to provide such services we will request permissions to access the photo, videos or files stored locally. |
| Location | When you are using services such as location via international dialing codes and network setting, we will request such permissions from you in order to acquire international dialing codes of your location, and enable your robot device to connect to WIFI. |
| Local Network | When you are connecting your APP to your robot device, we will request such permissions from you in order for your robot device to connect to WIFI. |
| Bluetooth | When you are connecting your APP to your robot device, we will request such permissions from you in order for your robot device to connect to WIFI. |
| Wifi State | When you are connecting your APP to your robot device, we will request such permissions from you in order for your robot device to connect to WIFI. |
| Vibration | When you control your robot device via APP and click the “Clean” button, we will use such permission to send you the touch feedback. |
| Install Packages | When there is an upgrade to the APP, we will request such permission to complete the upgrade. |
| Change Badge | For Huawei users, when you receive messages puched from the APP, we will use this permission to present the number of messages. |
| Record Audio | If you would like to create a video showing the Robot cleaning history under Freo Mode, we will request this permission to record audio in order for you to complete the video recording. |
| Foreground Service | If you would like to create a video showing the Robot cleaning history under Freo Mode, we will request this permission to record audio in order for you to complete the video recording. |
| Write Setting | Third-Party SDK Firebase uses this permission to enable read and write setting when you are opening the WIFI network. |
| Read Phone State | Third-Party SDK J-Push uses this permission to enhance the ability to target the users, in order to puch messgaes accurately. |
| Get Tasks | Third-Party SDK J-Push uses this permission to enhance the ability to target the users, in order to puch messgaes accurately. |
| Wake Lock | Third-Party SDK J-Push uses this permission to wake the locked screen when pushing messages. |

| IOS System | |
| --- | --- |
| Permission | Purposes |
| Camera | When you are interacting with us (online chatting), setting your profile photo, using screenshot to give us feedbacks, to provide such services we will request camera permissions from you in order to enable camera to take pictures. |
| Photo Library | When you are interacting with us (online chatting), setting your profile photo, using screenshot to give us feedbacks, to provide such services we will request permissions to access your photo library. |
| Location | When you are using services such as location via international dialing codes and network setting, we will request such permissions from you in order to acquire international dialing codes of your location, and enable your robot device to connect to WIFI. |
| Local Network | When you are connecting your APP to your robot device, we will request such permissions from you in order for your robot device to connect to WIFI. |
| Bluetooth | When you are connecting your APP to your robot device, we will request such permissions from you in order for your robot device to connect to WIFI. |
| Tracking | We request such permission to form the only user identifier, in order to provide better service to you and improve your experience. |