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## Email Subscription Privacy Policy

This Privacy Policy was published and took effect on Nov.12th, 2021. If you no longer want to use our subscription service, you can visit the link <https://forms.gle/EPLrMBR12CzDYpnW9> to cancel the subscription.

This Privacy Policy will provide privacy details about how we manage the personal information you disclose when using our subscription service. Please take a moment to familiarize yourself with our privacy practices and let us know if you have any questions.

### Our commitment to you

The Privacy Policy is designed with you in mind, and it is important that you have a comprehensive understanding of our personal information collection and usage practices, as well as full confidence that ultimately you have control of any personal information provided to Roborock.

In this Privacy Policy, "personal information" means information that can be used to directly or indirectly identify an individual, either from that information alone or from that information combined with other information Roborock has access to about that individual.

We are committed to protecting the privacy, confidentiality, and security of your personal information by complying with applicable laws, and we are equally committed to ensuring that all our employees and agents uphold these obligations.

Ultimately, what we want is the best for all our users. If you have any concerns with our data handling practices as summarized in this Privacy Policy, please contact us through [privacy@roborock.com](mailto:privacy@roborock.com) (if you are a European Union user under the General Data Protection Regulations, please use [privacy@roborock-eu.com](mailto:privacy@roborock-eu.com)), so that we can handle your specific needs. We are glad to deal with your problem directly.

## What information is collected and how we can use it

### Types of information collected

To provide our subscription service to you, we will ask you to provide personal information that is necessary for the provision of these services. Information will not be further processed in a manner that is incompatible with those purposes. We may collect the following types of information:

- Contact information: We use your Email address to provide you with our newsletters, discount information, new product information and other campaign information.

### How personal information can be used

You hereby consent that we may process and disclose personal information to our affiliated companies and Third-Party Service Providers (defined below) for the purposes stated in this Privacy Policy.

We may use your personal information for the following purposes:

- Providing you with our newsletters, discount information, new product information and

## **With whom we share your information**

We do not sell any personal information to third parties.

We may disclose your personal information on occasion to third parties (as described below) to provide the products or services that you have requested.

Disclosure may be made to Third Party Service Providers and affiliated companies listed in this section below. In each case described in this section, you can be assured that Roborock will only share your personal information following your consent. Your consent to Roborock will engage sub-processors for the processing of your personal information. You should know that when Roborock shares your personal information with a Third-Party Service Provider under any circumstance described in this section, Roborock will contractually specify that the third party is subject to practices and obligations that comply with applicable local data protection laws. Roborock will contractually ensure compliance by any Third-Party Service Providers with the privacy standards that apply to them in your home jurisdiction.

### **Sharing with our group and third-party service providers**

From time to time, in order to conduct business operations smoothly to provide you with the full capabilities of our products and services, we may disclose your personal information to Roborock affiliated companies (which involve product sales, after-sales services, etc.), or third party service providers (our data storage facility, technical support). Such Third-Party Service Providers only process your personal information on Roborock's behalf or for one or more of the purposes listed above.

### **Information not requiring consent**

For the avoidance of doubt, Roborock may collect, use, or disclose your personal information without your consent to the extent it is allowed explicitly under local data protection laws.

## **Security safeguards**

### **Roborock's security measures**

We are committed to ensuring that your personal information is secure. To prevent unauthorized access, disclosure or other similar risks, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we collect on your mobile terminal and Roborock's websites. We will use all reasonable efforts to safeguard your personal information.

All your personal information is stored on secure servers and protected in controlled facilities. We classify your data based on importance and sensitivity and ensure that your personal information has the highest security level. We make sure that our employees and Third Party Service Providers who access the information to help provide you with our products and services are subject to strict contractual confidentiality obligations that will cause them to be disciplined or terminated if they fail to meet their obligations. We have special access controls for cloud-based data storage as well. In summary, we regularly review our information collection, storage, and processing practices, including physical security measures, to guard against any unauthorized access and use.

We will take all practicable steps to safeguard your personal information. However, you should be aware that the use of the internet is not entirely secure, and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the internet.

We will notify the data breach to the relevant supervisory authority, or under some circumstances, notify the personal information breach to the data subjects by complying with applicable laws, including your local data protection legislation.

### **What you can do**

- You can safeguard your personal information by not disclosing your login password or account information to anybody unless you duly authorize such person.
- Roborock cannot be held responsible for lapses in security caused by third-party access to your personal information as a result of your failure to keep your personal information private. Notwithstanding the preceding, you must notify us immediately if there is any unauthorized use of your account or any other breach of security.

- Your assistance will help us protect the privacy of your personal information.

## Retention policy

Personal information will be held for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws. We shall cease to retain personal information or remove the means by which the personal information can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal information was collected is no longer being served by retention of the personal information. If further processing is for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes according to the applicable laws, the data can be further retained by Roborock even if the further processing is incompatible with original purposes.

## You have control over your personal information

Roborock recognizes that privacy concerns differ from person to person. Therefore, we have provided some examples to describe the ways we can help you restrict collection, use, disclosure, or processing of your personal information and control your privacy settings.

## Delete information

You can delete the information you actively enter at any time in the personal user interface.

If you want to delete all your personal information in our servers, contact [privacy@roborock.com](mailto:privacy@roborock.com) (If you are European Union user under the General Data Protection Regulation, contact [privacy@roborock-eu.com](mailto:privacy@roborock-eu.com)). We will delete the data after receiving the request and confirming your identity.

## Access, update, correct, erase or restrict processing your personal information

- You have the right to request access to and/or correction of any personal information that we hold about you.
- You can update and correct your settings information at any time in the user's personal interface, including user nicknames, avatar images, background settings, etc.
- If you would like to request access to your personal information held by us or if you believe any information we are holding on you is incorrect or incomplete, email us as soon as possible at [privacy@roborock.com](mailto:privacy@roborock.com). (If you are a European Union user under the General Data Protection Regulation, contact [privacy@roborock-eu.com](mailto:privacy@roborock-eu.com))
- If you are a European Union user under the General Data Protection Regulation (GDPR), you have the right to request us to erase your personal information. We shall consider the grounds regarding your erasure request and take reasonable steps, including technical measures, if the grounds apply to GDPR.
- If you are a European Union user under GDPR, you have the right to obtain from us the restriction of processing your personal information. We shall consider the grounds regarding your restriction request. If the grounds apply to GDPR, we shall only process your personal information under applicable circumstances in GDPR and inform you before lifting any processing restrictions.
- If you are a European Union user under GDPR, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- If you are a European Union user under GDPR, you have the right to receive your personal information in a structured, commonly used format and transmit the information to another data controller.

## Withdrawal of consent

- You can visit the link <https://forms.gle/EPLrMBR12CzDYpnW9> to cancel the subscription.
- Please recognize that your withdrawal of consent could result in certain legal consequences. Depending on the extent of your withdrawal of consent for us to process your personal information, it may mean that you will not be able to enjoy our products and services.

## Transfer of personal information outside of your jurisdiction

To the extent that we may need to transfer personal information outside of your jurisdiction, whether to our affiliated companies or Third-Party Service Providers, we shall do so in accordance with the applicable laws. In particular, we will ensure that all transfers will be in accordance with requirements under your applicable local data protection laws by putting in place appropriate safeguards.

Roborock uses its own operations and global cloud service provider facilities to process and

back up personal information. At present, Roborock has owned or commissioned cloud service providers with data centers in Germany, and the United States. These overseas jurisdictions may or may not have in place data protection laws which are substantially similar to that in your home jurisdiction. You have understood that the risks under applicable data protection laws are different, and we may transfer to and store your personal information at our overseas facilities with your consent. However, this does not change any of our commitments to safeguard your personal information in accordance with this Privacy Policy. If you are a European Union user under the General Data Protection Regulation, your personal information will be stored in Germany's Server.

## Miscellaneous

### Minors

- We consider it the responsibility of parents to monitor their children's use of our products and services. Nevertheless, it is our policy not to require personal information from minors or offer to send any promotional materials to persons in that category.
- Roborock does not seek or intend to seek to receive any personal information from minors. Should a parent or guardian have reasons to believe that a minor has provided Roborock with personal information without their prior consent, contact [privacy@roborock.com](mailto:privacy@roborock.com) (if you are a European Union user under the General Data Protection Regulation, contact [privacy@roborock-eu.com](mailto:privacy@roborock-eu.com)) to ensure that the personal information is removed, and the minor is unsubscribed from any applicable Roborock services.

### Order of precedence

If you have agreed to our applicable User Agreement, in the event of inconsistency between such User Agreement and this Privacy Policy, this Privacy Policy shall prevail.

### Updates to the Privacy Policy

We keep our Privacy Policy under regular review and may update this Privacy Policy to reflect changes to our information practices. If we make material changes to our Privacy Policy, we will notify you through your mobile terminal, so that you may be aware of the information we collect and how we use it. Such changes to our Privacy Policy shall apply from the effective date as set out in the notice or on the website. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the app will be taken as acceptance of the updated Privacy Policy. We will seek renewed consent before we collect more personal information from you or if we wish to use or disclose your personal information for new purposes.

## Do I have to agree to any third-party terms and conditions?

Our Privacy Policy does not apply to products and services offered by a third party. The app may include third party products, services, and links to third party websites. When you use such products or services, they may collect your information too. For this reason, we strongly suggest that you read the third party's Privacy Policy as you have taken time to read ours. We are not responsible for and cannot control how third parties use personal information which they collect from you. Our Privacy Policy does not apply to other sites linked from our services.

### About our systematic approach to managing your personal information

If you are a European Union user under GDPR, Roborock will provide a systematic approach to protect personal information and deeply engages our people, management processes, and information systems to apply a risk management methodology. According to the GDPR, for instance, (1) Roborock has set up a Data Protection Officer (DPO) in charge of data protection. The DPO can be reached at [dpo@roborock.com](mailto:dpo@roborock.com); (2) operating procedures, including the data protection impact assessment (DPIA).

## Contact us

If you have any comments or questions about this Privacy Policy or any questions relating to Roborock's collection, use or disclosure of your personal information, please contact us at the address below referencing "Privacy Policy":

Room #6016, #6017, #6018, Building C Baosheng Square, Heiquan Road

Haidian District

Beijing, China

Email: [privacy@roborock.com](mailto:privacy@roborock.com) (If you are a European Union user under the General Data Protection Regulation, contact [privacy@roborock-eu.com](mailto:privacy@roborock-eu.com))

Thank you for taking the time to understand our Privacy Policy!

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Company	▼
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