# **Data Protection Notice for Romow**

Ningbo Daye Garden Machinery Co., Ltd. (hereinafter referred to as the "Company") is pleased to share the mobile application *Romow* with you. Protecting individuals is important to us. You provide data on the basis of the application. The company processes this information in accordance with the "European General Data Regulations".

In the following, we will describe what data is usually processed when using our products.

## 1. Responsible Entity

The entity responsible for processing your data is Ningbo Daye Garden Equipment Co., Ltd. In the following, we will describe which data is generally processed when using our offering.

Our contact information is as follows:

Ningbo Daye Garden Machinery Co., Ltd. 58 Jinfeng Road 315403 Yuyao City, Zhejiang Province, China E-Mail: dayeoffice@dayepower.com

The contact information of the data protection office can be found in section 18 below.

### 2. Personal Data

Personal data is specific information related to an individual or actual situation that can identify an individual. For example, this includes information such as IP address and browser settings, address format, correct name, address, email address, phone number, date of birth, and information about Daye products. Personal information that cannot be directly related to your true identity (such as your favorite website or the number of users on the website) is not considered personal information.

## 3. Processing Personal Information

To use the *Romow* application, an account must be created. Personal details, such as your address form, your name, your address, your company (if applicable), your date of birth, telephone number, email address, and information about your Daye products will all be used as Part of this registration is recorded.

#### 4. Specified use and dissemination of personal data

The Company uses the personal data you provide for the purpose of the technical adm1nistrat1on of the app, m providing services, for customer management only to the extent required for each respective purpose.

## 5. Legal basis for data processing

The legal basis for processing your personal data depends on the purpose of the processing.

## **5.1 Services**

The legal basis for processing personal data for the above-mentioned purposes is Art. 6(1) lit. b of the GDPR. We provide services as part of fulfilling contractual obligations. If we are unable to process personal data, we will not be able to perform or perform the contract with you.

## 5.2 Romow app

The following data is collected or stored for the *Romow* application.

- Date: required for operation
- E-mail address: This is required for registration and authentication.
- Password: This is required for registration and authentication.
- Country and language: This information is required for language settings and marketing purposes in the app.
- Device serial number: The device serial number is necessary for device registration and identification of the device in the application.
- Location: The system needs this information, but it will not be stored or transmitted.
- Bluetooth ID: Bluetooth ID is necessary for device registration and identification of the device in the application.
- Time and date of last synchronization: Our customer service department needs this
  information so that they can check whether the available information is up to date when
  repairing.
- Set schedule (date and time): This information is required for the "Schedule" function.
- Set the mowing area (start point and frequency): This information is required for the "area" function.
- Working hours: This information is required for the "Statistics" function.
- Mowing time: This information is required for the "Statistics" function.
- Distance traveled: This information is required for the "Statistics" function.
- Lawn mower status: This information is required for the "status indication" function.
- Error message: This information is required for the "error message" function.
- Rain sensor settings: This information is required for the "rain sensor settings" function.
- Edge cutting settings: "Edge cutting settings" function requires this information.
- E-mail address of other users: save the e-mail address so that other users can use the registered device.
- Device name: storage device name for user personalization.
- Firmware version: Our customer service department needs the firmware version so that they
  can check if the firmware is up to date during repairs. This information is also required for the
  "firmware update" function.
- Battery charging status: This information has been saved so that it can be displayed in the app.
   Our customer service department also requires them to provide technical support to customers during repairs.
- Item number: This is not actively transmitted, but determined according to the serial number,
   which is necessary for registering the device.

- Version number: This is not actively transmitted, but determined according to the serial number, and the device needs to be registered.
- MAC address: This is not actively transmitted by the application, but a part of the Bluetooth protocol, which is provided to us by Android to identify the device.

#### **Authorizations**

The operating system requires the following permissions to use all the functions of the application:

#### Camera: capture images and videos

#### Internal memory: Change or delete SD card content Read SD card content

You can choose to register your device in the app. To do this, you can enter the serial number of the device or use the camera to scan. To do this, you will be asked to access the camera. The memory on the SD card is only needed temporarily during registration. When registering the lawn mower via the camera, the app only uses it as a scanner. Taking Pictures. However, these are only temporarily used to scan the serial number, so they will not be stored permanently.

Location: Access accurate location (based on GPS and network)

Approximate location of visit (based on network)

**Other: Access Bluetooth settings** 

#### Access other location provider commands

Bluetooth is used to connect your mobile terminal device and lawn mower. This use requires location sharing specified by the operating system. Without this, the use of Bluetooth is impossible. We ourselves cannot access this location at any time. This has nothing to do with us, it is just needed by your mobile device to pair with the lawn mower via Bluetooth.

#### Access all networks

**Retrieve network connection** 

**Retrieve Wi-Fi connection** 

#### Access internet data

These are used for communication between the user and the server, for example during the login process.

#### Turn off the phone's sleep mode

This access permission is required if you activate the push notification of the information displayed by the app. For example, on the lock screen. There is no data transfer here either. It is also required for the firmware update of the robotic lawnmower. The new firmware is installed on the robotic lawnmower via an app or mobile phone. Since this update process may take a few minutes, we will disable sleep mode during this period to avoid interruption of the update process.

## Read service configuration

This access is required when submitting a crash report.

#### 6. Transfer of data

Your personal data is not transferred to third parties, unless required for the purpose of concluding

a contract or you have explicitly given your consent. When providing services, it may, for example, be necessary for us to forward your address and order information to your wholesale partner, service partner. If we use external service providers, they are carefully selected and are obligated to comply with all data protection provisions in accordance with Art. 28 GDPR (see No. 5).

#### 7.Contact form

When you contact us via email or contact form, the information you provide will be stored for use in processing your inquiries and potential follow-up questions.

## 8. Data security

Our employees and service providers are obliged to keep confidential and comply with applicable data privacy laws. The company adopts appropriate technical and organizational security measures to protect your personal data from loss, alteration, destruction, and unauthorized access and unauthorized dissemination. Our security measures will be updated according to technological progress.

In order to protect your data during transmission, we use the most advanced encryption process.

#### 9. Data Retention Period

We usually retain your data as long as it is needed for the use of our products and related services, or as long as we continue to retain its legitimate rights and interests (for example, after the performance of the contract, we may still have the legitimate rights and interests of mail marketing [after a separate double-opt-in procedure]). The deletion of data occurs after the statutory or contract retention period (such as the retention period stipulated by tax law and commercial law) expires. Data that is not restricted by the retention period will be deleted once it is no longer needed for the specified purpose.

#### **Device/user inactivity**

The account, connection with the device, and device data will be deleted after 18 months of inactivity, that is, the serial number will be released again for registration. You will receive a reminder email about this in 16 months. You can of course re-register the device at any time.

## 10. User Rights

As a user of our app, you are entitled to certain rights. To exercise your rights, please refer to the information in the Contact section. However, please make sure that we can clearly identify you.

## 11. Right to obtain information, make corrections and delete data

According to the General Data Protection Regulation, you can receive free written information (such as name, address) about what data we store about you at any time upon request. In addition, if the statutory requirements are met, you have the right to correct or delete these data. For example, business process data subject to the legal retention period is not subject to this right to

delete.

## 12. Right to restrict data processing

You have the right to restrict the processing of your personal data.

## 13. Right to Object

In addition, you have the right to object to our processing of data. We will then stop processing your data unless—according to the law—we can prove compelling legal reasons to continue processing beyond your rights.

## 14. Right to Data Transferability

In addition, upon request, we promise to provide the transferability of the personal data you provide by providing it in a common and machine-readable data format.

#### 15. Withdrawal of Consent

You can withdraw the consent granted to us to process personal data for one or more specific purposes at any time, and it will take effect in the future. This will not affect the legality of the processing before you withdraw your consent.

## 16. Automated processing of personal data

Only when it is necessary to sign or perform the contract and do not involve any legal or similar impact on you, your personal data will only be processed through automated means.

## 17. Modification of our data protection provisions

We reserve the right to modify this data protection notice regularly to make it comply with current legal requirements or to make changes to our services in the data protection notice (for example, when a new service is launched). This data protection notice will then apply to any subsequent visits to this website.

### 18. Lodging Complaints with regulatory authorities

You have the right to submit any complaints about the processing of your personal data to the relevant supervisory authority. You can contact the data protection agency that has jurisdiction in your place of residence or your federal state, or the data protection agency that has jurisdiction over us. This is:

Unabhängiges Datenschutzzentrum Saarland Fritz-Dobisch-Str. 12 66111 Saarbrücken Germany

E-Mail: poststelle@datenschutz.saarland.de

If you have any complaints, you can contact our data protection officer. We recommend that you only send confidential information via postal mail.

Daye Europe GmbH
Data Protection Officer
Parkstraße 1a
66450 Bexbach
Germany

Mail: Info@Daye-Europe.de Phone: +49 6826 93016 0