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1. About this Privacy Policy

At Clobotics, we respect your privacy and are committed to protecting it through our compliance with this privacy policy which describes how and why we might collect, store, use, and/or share (“process”) your information when you interact with us, such as when you:

- Visit our website at <https://clobotics.com/> (our “Website”), or any website of ours that links to this privacy policy
- Engage with us in other related ways, including any sales, marketing, or events

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it.

1.1. Data Controller

We are the data controller for the processing of the personal data that we receive about our customers and business partners. You will find our details below.

Clobotics Corporation
Skyline Tower, 10900 N.E. 4th Street, Suite 2300
Bellevue, WA 98004
United States

1.2. Questions or concerns?

By using our Website, you agree to this privacy policy. If you do not agree with our policies and practices, please do not use our Website.

If you have any questions about the processing of your personal data, please contact us via dataprotection@clobotics.com.

2. What information do we collect?

We collect several types of information from and about users of our Website. You can read about what type of information is collected, how it is collected, and how it is processed in the following sections.

2.1. Information you disclose to us

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and services by filling out our contact form, or otherwise when you contact us. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Job titles
- Company
- Region

We do not process sensitive personal information (SPI).

2.1.1. Job Applications

We welcome job applications in order to assess whether they match a recruitment need in our company.

- If you send us your job application, our legal basis for processing your personal data is Article 6(1)(f) of the General Data Protection Regulation (GDPR).
- If you have sent an unsolicited application, HR will immediately assess whether your application is relevant and then delete your data again if there is no match.
- If you have sent an application for a job vacancy, we will dispose of your application in the event that you are not hired and immediately after the right candidate is found for the job.
- If you are part of a recruitment process and/or are hired for the job, we will provide you with separate information on how we process your personal data in this context.

2.2. Information automatically collected

We automatically collect certain information when you visit, use, or navigate our Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as:

- Your IP address
- Browser and device characteristics
- Operating system
- Language preferences
- Referring URLs
- Internet connection

- Device name
- Country
- Location
- Information about how and when you use our Website

This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

2.3. Information collected from other sources

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, and from other third parties.

This information may include:

- Mailing addresses
- Job titles
- Email addresses
- Phone numbers
- Intent data (or user behavior data)
- Internet Protocol (IP) addresses
- Social media profiles
- Social media URLs
- Custom profiles (for purposes of targeted advertising and event promotion)

3. How do we process your information?

We process your personal information for a variety of reasons, depending on how you interact with our Website, including:

- **To deliver and facilitate delivery of services to the user.**
We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.**
We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.

- **To send administrative information to you.**
We may process your information to send you details about our services, changes to our terms and policies, and other similar information.
- **To fulfill and manage your orders.**
We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- **To enable user-to-user communications.**
We may process your information if you choose to use any of our offerings that allow for communication with another user.
- **To save or protect an individual's vital interest.**
We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.
- **To fulfill any other purpose for which you provide it.**
We may process your information to fulfill your inquiry or request.

4. What legal bases do we rely on to process your information?

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.**
We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- **Performance of a Contract.**
We may process your personal information where we believe it is necessary to fulfill our contractual obligations to you, including providing our services or at your request prior to entering into a contract with you.
- **Legal Obligations.**
We may process your personal information when we believe it is necessary for

compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

- **Vital Interests.**

We may process your information where we believe it is necessary to protect your vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the

information was produced

- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

5. When and with whom do we share your personal information?

We may share your personal information in the following situations:

- **Business Transfers.**
We may share or transfer your information in connection with, or during negotiations of, any merger, sale or company assets, financing, or acquisition of all or a portion of our business to another company.
- **Business Partners.**
We may share your information with our business partners for the purpose of providing the services to you or for other purposes that are disclosed to you at the time of collection.
- **Service Providers.**
We may share your information with third party service providers who perform services on our behalf, such as hosting and maintenance, analytics, marketing, and customer service.
- **Third Parties.**
We may share your information with third parties if we believe in good faith that such sharing is necessary to (a) comply with legal requirements or process; (b) protect or defend the rights, property, or safety of us, our users, or others; or (c) prevent or stop any illegal, unethical, or legally actionable activity.
- **Affiliates.**
We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

6. Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookie Policy](#).

7. How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 1 year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. How do we keep your information safe?

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process however, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, assess, steal, or modify your information.

Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

9. Do we collect information from minors?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Website. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate any potential account with us and take reasonable measures to promptly delete such data from our records.

If you become aware of any data, we may have collected from children under age 18, please contact us at dataprotection@clobotics.com.

10. What are your privacy rights?

In some regions (like EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right:

- To request access, update or deletion of your personal information, and to obtain a copy of your personal information
- To request rectification or erasure
- To restrict the processing of your personal information
- To data portability, if applicable

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make any of above requests by contacting us at dataprotection@clobotics.com.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

<https://ec.europa.eu/newsroom/article29/items/612080>

If you are located in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>

Withdrawing your consent

If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to

withdraw your consent at any time. You can withdraw your consent at any time by contacting us at dataprotection@clobotics.com.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications

You can unsubscribe from our marketing and promotional communications at any time by writing an email with the headline “UNSUBSCRIBE” and send it to dataprotection@clobotics.com.

You will then be removed from the marketing lists. However, we may still communicate with you – for example, to send you service-related messages that are necessary for the administration and use of any potential account with us, to respond to service requests, or for other non-marketing purposes.

Cookies and similar technologies

Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

If you have any questions or comments about your privacy rights, you may email us at dataprotection@clobotics.com.

11. Specific private rights for California residents

If you are a resident of California, you are granted specific rights regarding access to your personal information.

The California Privacy Rights Act (CPRA) took effect on January 1, 2023 with a lookback period to January 1, 2022. The CPRA, which is a state-wide data privacy bill that amends and expands the existing California Consumer Privacy Act (CCPA), has created four new rights and modifies five existing rights for California residents.

Your four new rights are:

1. Right to correction.

You can request to have your personal information (PI) and sensitive personal information (SPI) corrected if you find them to be inaccurate.

2. Right to know about automated decision making.

You can request access to and knowledge about how automated decision technologies work and what their probable outcomes are.

3. Right to opt-out of automated decision making.

You can say no to your PI and SPI being used to make automated inferences, e.g., in profiling for targeted, behavioral advertisement online.

4. Right to limit use of sensitive personal information.

You can make us restrict our use of this separate category of personal information, particularly around third-party sharing.

Your five modified CPRA rights are:

1. Right to delete.

When you request deletion of your PI, we now must notify third parties to delete this as well.

2. Right to know

You can now request access to your PI collected beyond the original 12-month limit in the CCPA.

3. Right to opt-out

You can now opt out of businesses sharing and selling your PI specifically for behavioral advertisement, and not only of the sale of PI, as in the CCPA.

4. Rights of minors

The opt-in requirement for businesses when dealing with minors is extended to include the sharing of PI for behavioral advertising.

5. Right to data portability

You can request to have your PI transported to other businesses or organizations.

11.1. Are you a California resident?

The CCPA defines at “resident” as:

- 1) Every individual who is in the State of California for other than a temporary or transitory purpose and

- 2) Every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

If this definition of “resident” applies to you, we must adhere to above-mentioned rights and obligations regarding your personal information.

All other individuals are defined as “non-residents”.

12. Controls for do-not-track features

Most Web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected.

At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online.

If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

13. Do we make updates to this policy?

This policy may change from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible.

If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification.

Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

14. How can you contact us about this policy?

If you have any questions or comments about this notice, you may email us at dataprotection@clobotics.com or by post to:

Clobotics Corporation
Skyline Tower, 10900 N.E. 4th Street, Suite 2300

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