DATA PROTECTION POLICY FOR THE MYKOBOLD APP

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1 GENERAL

1.1 Personal data

Personal data are all information related to an identified or identifiable natural person. These include, for example, information such as your name, age, address, telephone number, your date of birth, your e-mail address, your IP address, or user behaviour. Information with which we cannot make reference to your person (or only with a disproportionate effort), e.g. through anonymisation of the information, is not personal data.

1.2 CONTROLLER / Data protection officer(s)

The controller within the meaning of the EU General Data Protection Regulation (hereinafter: GDPR) and other national data protection laws of the Member States as well as other data protection provisions with regard to personal data, which are processed as described below, is

Vorwerk International & Co. KmG
Verenastrasse 39
CH- 8832 Wollerau
Email: dpo@vorwerk.ch

You can reach the data protection officer(s) of the controller at:

The Data Protection Officer c/o Vorwerk
Vorwerk International & Co. KmG
Verenastrasse 39, CH- 8832 Wollerau
Email: dpo@vorwerk.ch

1.3 Subject matter of the Data Protection Policy

The following information will inform you how Vorwerk, as controller in connection with the MyKobold App ("App"), handles your personal data. Vorwerk is the provider of the App and thus the controller for data processing processes with regard to the App. This information is available for you at any time in the App under "More" / "Legal Information" / "Data Protection".

1.4 Legal basis of processing

The processing of personal data (e.g. collection, retrieval, use, storage, or transmission) always requires a legal basis or your consent. Processed personal data will be deleted as soon as the purpose of processing has been achieved and there are no longer any statutory mandatory retention obligations. In case provisioning of personal data is required for concluding a contract (See Sec. 2.2.) in case you decide not to provide the data we will not be able to provide you with services

1.5 Revocation of declarations of consent

If you have given us consent to process your personal data, you can revoke it at any time by following instructions provided in Sec. 2.7. of this document. Revocation does not affect the legality of the processing that has been carried out until then.

2 PROCESSING ACTIVITIES

To the extent to which we process your personal data in order to provide specific functions or services of the App, below you will find information about the specific processes, the scope and purpose of the data processing, the legal basis for processing, and the duration of storage, insofar as the latter deviates from the information under Clause 5.

2.1 DOWNLOAD OF THE APP

When downloading the App, the necessary information will be transmitted to the App store, in particular user name, e-mail address and customer number of your App store account, time of the download and the individual device code. We have no influence on this data processing and are not responsible for this. We only process the data if necessary for downloading the App to your mobile terminal. Further information on data protection of the App Store Operators can be found here:

https://www.apple.com/legal/privacy
https://policies.google.com/privacy

2.2 REGISTRATION

2.2.1 You can use the installed App even without creating a user account. However, some functions or services (such as the integration of a Vorwerk robot) require a user account. For the registration and creation of the user account, we need your e-mail address, to which we send you a verification code by e-mail, which you can enter in the App to confirm your email address. We process your e-mail address to set up and manage an individualised user account for you.

2.2.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

2.3 Profile data

2.3.1 Under "My Profile", you can optionally save and change your contact data such as telephone number to your user account. If you use certain functions or services of the App (e.g. you want to contact us), we process the profile data stored by you to be able to provide the function or service (e.g. to contact you). In addition, your data will be stored under "My Profile" in the App if you enter it in the context of the use of other functions (e.g. find an advisor or store). You can view the profile data at any time under "My Profile" and edit or delete your account.

2.3.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

2.4 USAGE DATA

Our App uses Google Firebase technology to collect and analyse information on the use and any errors of the App. Google Firebase is a service of Google Ireland Limited ("Google"), Gordon

House, Barrow Street, Dublin 4, Ireland). For this purpose, anonymous information about the use of the App is collected (e.g. page views or use of functions or services, times) and transmitted to Google and stored there. Google uses this information to evaluate the use of our App in an anonymous form and to provide associated services. However, we do not receive any personal information about you or your usage behaviour from Google. Further information on data protection at Google can be found here: https://policies.google.com/privacy?hl=de

2.5 ADD DEVICE

2.5.1 You can add a Vorwerk product to your user account, e.g. a specific vacuum cleaner model (for Kobold vacuum cleaners, see also section 3). If you use additional functions or services for this device (e.g. reminder function; customer service) within the scope of using the App, we use this information on the device to match your concern.

2.5.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

2.6 REMINDER

2.6.1 You can use the App to remind yourself of certain events, for example, regular maintenance of your devices or the possibility of a subsequent purchase of suitable consumables. For this purpose, we process the reminder date you set and the specific cycle for reminders for your added devices.

2.6.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

2.7 DEMONSTRATION

2.7.1 You can use the App to arrange for a demonstration with a Vorwerk customer advisor. For this purpose, the following data will be collected by Vorwerk International & Co. KmG Switzerland and transferred to MILGAL LTD: Product; first name, last name, email address or telephone number (depending on your preference to be contacted).

2.7.2 You may revoke your consent at any time by contacting aumiri.gelbman@gmail.com.

2.7.3 The legal basis of the data processing is Art. 6 Para. 1(a) GDPR.

2.8 Product videos

You can play product videos, e.g. product tutorials, via the App or by clicking on appropriate links in the browser of your mobile device. To provide such product videos, a connection to the technical infrastructure of Zendesk Inc. (“Zendesk”), 989 Market Street #300, San Francisco, CA 94102, is created. We have no influence on the type and scope of data processing at Zendesk. You can find more information on data protection at Zendesk here.

3 VACUUM ROBOT

As part of the use of the App, you can also add and control your vacuum robot (robot) as a device. In this context, personal data are processed within the functions shown below.

3.1 Add robot

3.1.1 You can add a vacuum robot to your user account (e.g., Vorwerk VR 200/VR 300), specifying the serial number. The specification of the number is required to enable a unique identification and a connection to the device.

3.1.2 The legal basis of the data processing by the Vorwerk is Art. 6 Para. 1(b) GDPR.

3.2 Map function

3.2.1 The map function for VR300 allows the creation of map data by the vacuum robot, which contains information about the location of operation of the robot (e.g. rooms, workflows, loading times). This information can be stored in the Robot Cloud and accessed by the App and processed there by you within the framework of the control of the robot (e.g. drawing of virtual boundaries “no go lines” in certain work areas of the robot). Any access to or processing of such data by Vorwerk is only done on your request by the customer service support.

3.2.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

3.3 Robot control

3.3.1 You can use the App to control the vacuum robot (e.g. start/stop/ specify work areas). For this purpose, the corresponding commands are transmitted together with authentication data between App and device. Storage of this data is not performed by Apple/ Google**.**

3.3.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

4 CUSTOMER SERVICE SUPPORT

4.1 Depending on the type of contact desired and type of requests received, we may collect certain data from you and share it with the customer service support provided by MILGAL LTD. Such data can vary from being related to fixing a technical problem to request for information, in addition we will collect: Product; first name, last name, email address or telephone number (depending on your preference to be contacted).The foregoing data will be used in order to fulfil the specific customer service request.

4.2 The legal basis of the data processing is Art. 6 Para. 1(b) GDPR.

5 DELETION / RETENTION OF DATA

5.1 You can completely delete your user account under “My Profile” at any time and only by you. Please note that after deletion of the user account, it is no longer possible to use any functions of the App.

5.2 In addition, Vorwerk stores your data as long as this is necessary and permissible to maintain your account. After completion of the intended purpose or after the expiry of the statutory retention periods, your data will be deleted immediately.

6 RECIPIENT OF DATA, DATA TRANSFER TO THIRD COUNTRIES

6.1 Vorwerk International engages third parties to provide the technical infrastructure of the App and associated services (service provider; call centre). These service providers process your personal data only on our order and according to our instructions. These third parties are obliged to maintain data protection and confidentiality of the data. Vorwerk is responsible for processing the data.

6.2 In addition, we only disclose your personal data to third parties if:

- you have given your express consent in accordance with Art. 6 para. 1 sentence 1(a) GDPR,
- it is legally permissible and required in accordance with Art. 6 para. 1 sentence 1(b) GDPR in order to fulfil a contractual relationship with you,
- there is a statutory obligation of disclosure in accordance with Art. 6 para. 1 sentence 1(c) GDPR,
- the disclosure according to Art. 6 para. 1 sentence 1(f) GDPR is necessary for the safeguarding of legitimate company interests as well as for the assertion, exercise, or defence of legal claims, and there is no reason to believe that you have an overriding, protectable interest in the non-disclosure of your data.

6.3 Vorwerk reserves the right to transmit your data to third parties outside the EU, in particular in the USA and in Switzerland, in order to provide services. In these cases, we ensure that your personal data will only be forwarded to third parties outside the EU if an appropriate level of data protection has been established by the European Commission or we have agreed to the standard contractual clauses with these third parties.

7 RIGHTS OF DATA SUBJECTS

7.1 If personal data are collected or processed by us via this App, you are a data subject within the meaning of GDPR. In this case, you have the right to obtain information from us (Art. 15 GDPR), the right to rectification (Art. 16 GDPR) and deletion (Art. 17 GDPR), with respect to your data, the right to limit the processing (Art. 18 GDPR), the right to object to the processing (Art. 21 GDPR), and the right to data portability (Art. 20 GDPR).
These rights can be asserted to Vorwerk, e.g. by e-mail to dpo@vorwerk.ch .

7.2 You also have the **right to complaint** to a supervisory authority pursuant to Art. 77 GDPR.

8 RIGHT TO OBJECT

8.1 In the case of processing of your personal data based on legitimate interests pursuant to Art. 6 Para. 1 Sentence 1 (f) GDPR, you have the right pursuant to Art. 21 GDPR to object to the processing of your personal data, insofar as there are reasons for this arising from your special situation or the objection is aimed against direct advertising.

8.2 In the case of direct advertising, you have a general right of objection that will be implemented by us without having to specify a special situation.

8.3 If you wish to exercise the aforementioned rights or would like further information, our support is

available at the email address dpo@vorwerk.ch

9 DATA PROTECTION AND SECURITY MEASURES

9.1 We protect your privacy and will treat your personal data confidentially.

9.2 In order to avoid a manipulation, loss, or misuse of your data stored by us, we take extensive technical and organisational security precautions that are regularly reviewed and updated in line with technical advancements.

9.3 However, we would like to point out that it is possible, due to the structure of the internet, that the rules of data protection and the aforementioned security measures are not comprehensively observed by other persons or institutions not within our area of responsibility.

10 RESERVATION OF AMENDMENT

We reserve the right to adapt the Data Protection Policy from time to time, e.g. if there are changes in data processing. In the event of an update of this data protection information, we will inform you in an appropriate manner, e.g. via the App or via email.