

PRIVACY POLICY FOR KÄRCHER HOME ROBOTS

Effective as of September 2022

Last updated July 2024

The information below explains, how your personal data is processed, when you use the Kärcher Home Robots System including the App.

1. Kärcher Home Robots

Use of the Kärcher Home Robots System by Alfred Kärcher SE & Co. KG, Alfred-Kärcher-Straße 28-40, 71364 Winnenden, Phone: [+49 \(0\)7195/14-0](tel:+49(0)7195/14-0), Email: info@karcher.com (hereinafter referred to as “Kärcher”) is only possible by means of the Kärcher Home Robots App (“App”) for smartphones with an iOS or Android operating system. You can contact the Kärcher Data Protection Officer at the address above or by emailing data.privacy@kaercher.com.

2. Downloading the App

You can download the Kärcher Home Robots App free of charge from the Google Play store or the Apple App Store. To do so, you must open a customer account in either the Google Play store or the Apple App Store and enter your data there. However, this data is not collected by Kärcher, and Kärcher therefore has no influence over it and is not responsible for it.

You must also accept the Terms of Use of the app store in question to open a customer account. When you download the Home Robots App, you must also accept the associated Terms of Use with legally binding effect.

When downloading the App from an app store, information is transferred to the app store, in particular your username, email address and customer number of your account, the date/time of downloading and the individual device ID. However, we have no influence over the collection of this data and are not responsible for it.

3. Setting up and Using the App

You must register in order to set up and use the App.

When you open the App for the first time, we will ask you to confirm your country and region and select the language of the App.

The App account is the premise for you to use the App business functions on the mobile device containing the App ("your mobile device") after downloading the App, and will collect all kinds of data you provide and receive in the App based on this. When you register an account in the App, we will collect your email and password.

The above information will be used to verify your identity, match and collect a series of operation activities you make with your App account, match and feedback the operation status of your Home Robot, facilitate the handling of customer service and after-sales service requirements you put forward to us, and send you a notice about the above situation, a notice about major changes and updates of service functions, and technical and safety notices.

After loading the App on your mobile device, you can bind your App account to your Home Robot. Therefore, you first need to configure the network, that is, establish the information flow path of your App account and your Home Robot through our server. In this regard, you need to connect your mobile device, App account and your Home Robot to your Wi-Fi network.

The data collected during the network configuration process is:

- App name
- network card (MAC) address, operating system and its version
- SSID, network system, displayed IP address, location, time zone and time of sending network configuration request to our server of the same Wi-Fi network accessed by your mobile device and your Home Robot
- the model, SN code and MAC address of your Home Robot
- the status and fault type of your network configuration.

4. Using Kärcher Home Robots Systems

The basic business functions of Kärcher Home Robots System we provide to you include:

- all functions of your Home Robot (subject to the product specifications)
- the App is paired with your Home Robot, controls and records the operation of the product and
- communication and handling related to the use and operation of the App and your Home Robot paired with the App.

Specifically, for the following occasions, we process personal data, so that we can safely

and effectively realize the following functions:

1. Cleaning Function

When you use the cleaning function of the Home Robot, we will collect information about your house floor map and settings on cleaning area, mode, suction level and water consumption, so as to enable the device to clean specified area. We will also collect information about your cleaning schedule

(such as scheduled cleaning duration and mode), in order to perform the scheduled cleaning task in specified time duration

2. Recording and Displaying Cleanup Information

When you use the Home Robot, we may collect and record the information about your cleanings, including the total number of cleanings and the date, time, route, area, duration and zone (which is obtained from radar scanning and named by you) of each cleaning task. This information will be used to display the cleaning history of the product. We will collect information about the cleaning process, so as to display usage history and help you understand the area, duration and zone of each cleaning as well as the accumulated cleaning time and total number of cleanings.

3. Cleanup Map and Obstacle Avoidance

When you use Home Robots with the Obstacle Avoidance function, it will sample the objects in front of it by using the camera to extract characteristic information (object outline and geometric characteristics), so as to judge what type of object it is. The device will determine the room type based on identified furniture types to assist with the naming of room on the map. You can manage and edit the maps generated by completed cleanup tasks in App.

4. AI-powered Object Recognition and Obstacle Avoidance

When you use Home Robots with the AI-powered Object Recognition function, the device camera will collect image information about the objects in front of the device and extract characteristics within milliseconds for recognition. After recognizing the object types, the device will be able to make judgment and avoid obstacles during cleanup tasks. The collected images will be deleted immediately afterwards. You can select whether to enable recognition feature and whether to display identified objects on the cleanup map. We fully understand the importance of your privacy. You can rest assured that none of the images collected will be stored locally or uploaded to a server. These images are only used for generating cleanup maps, enabling obstacle avoidance, and will not be used for any other purposes.

When you use the Kärcher Home Robots System, the App or the Home Robot will therefore store the following data, to enable you to use Kärcher Home Robots System, without transmitting it to us. The information is:

- Memory Map
- Software Version
- Machine Serial Number
- email address
- WIFI Data

When you use the Kärcher Home Robots App, we collect the following data transmitted by your mobile device to enable you to use the Kärcher Home Robots App. The information is:

- Cleaning History

- Cleaning Record
- Running Logs
- Location
- Memory Map
- Software Version
- Serial Number
- Email
- Phone Serial Number

Related to this, we will need to call the following permissions of your mobile device:

- in order to connect the network configuration and the App functions that need to be connected to the network, we need to call "mobile data", obtain "Wi-Fi information", and also need "local network" permission.
- in order to complete the network configuration more efficiently, we also need to obtain the "positioning" permission and "Bluetooth" permission of your mobile device
- in order to store the App usage log and update the App version, it is necessary to call the "store" permission
- to ensure the security of your App account, you need to obtain "device information"
- in order to push various messages related to your account to your mobile device, we need the "notification" permission.

You have the right to choose whether to provide specific information. However, in most cases, if you do not provide such information, we may be unable to provide corresponding services to you, or we may be unable to respond to a problem you encounter.

Some models of Home Robots we provide support the "Share devices" function. The App account holders (i.e. "sharer") who are paired with the robot are allowed to share control equally with other App account holders (i.e. "sharee"). For the purpose of this Privacy Policy, these home robots are regarded as your "Home Robots". For the avoidance of doubt, this Privacy Policy applies to all uses of such household robots by the sharer and the sharee. You can also delete the devices that have accepted sharing on the App, or turn off the permission to share with others as a whole.

5. Purpose of the Processing and Legal Basis

All the data is collected, processed and stored by Kärcher to provide the Kärcher Home Robots Service in accordance with Article 6 (1) lit.b of the General Data Protection Regulation (GDPR).

Kärcher also uses the data collected on the Home Robots devices for the purposes of

quality assurance and to improve the quality of its Home Robots products in accordance with Article 6 (1) lit.f GDPR. In addition, Kärcher evaluates your usage behavior and information on where and how you use the products in question in accordance with Article 6 (1) lit.f GDPR on the basis of the legitimate interests of Kärcher in the context of market research, to identify trends and to make product recommendations. The data concerned is pseudonymised for this purpose. By using this data in this way, Kärcher does not draw any conclusions of any kind regarding individual users and does not profile users.

Your personal data is not shared with third parties. Kärcher, however, reserves the right to have the data processed by service providers on behalf of Kärcher in accordance with Article 28 GDPR or other applicable privacy laws. As the data processing is necessary for the performance of the contract concluded between yourself and Kärcher, performance of the contract is not possible without the processing of the data.

6. Recipients of personal data

In the course of our processing of personal data, it may happen that the data is transferred to or disclosed to other companies, which provide services for us.

In such cases, we comply with the legal requirements and, in particular, conclude appropriate contracts or agreements in accordance with Art. 28 GDPR or other applicable privacy laws that serve to protect your personal data with the recipients of such data.

7. Data Transfer outside the European Union

If we process data of EU residents in a third country (i.e., outside the European Union (EU), the European Economic Area (EEA)) or the processing takes place in the context of the use of third-party services or the disclosure or transfer of data to other persons, entities or companies, this is only done in accordance with the legal requirements.

We only process or have the data processed in third countries with a recognized level of data protection or based on contractual obligations through so-called standard protection clauses of the EU Commission, in the presence of certifications or binding internal data protection regulations (Art. 44 to 49 GDPR).

8. Storage duration

Deletion of your user data

Upon termination of the contractual relationship, the personal data held at Kärcher is deleted provided that this does not conflict with any statutory retention obligations. This action will happen if you delete your account.

Deletion of the data generated by your device

The data generated by the device (e.g. cleaning history) are stored for a maximum period of 6 months.

9. Your Rights, Questions and Information

To access and correct your personal data, you can log in to your App account to view the "user information" and "Settings" interfaces, view or modify your submitted personal data, manage the receiving address and the associated third-party account, or make relevant privacy and security settings. However, for the sake of security and identification, or according to the mandatory provisions of laws and regulations, you may not be able to modify some of the initial registration information you provided at the time of registration. If you cannot access and correct your personal data through the above methods, you can use the following rights.

- If you are located in the EU / EEA, you have the right to information as to whether and what personal data we store concerning you, to rectification or erasure, or to restrict the processing of your data, to object to the processing, and the right to data portability. As your personal data is processed for the performance of a contract, you can no longer use the services provided under the contract once you have objected to the processing of your personal data.
- If you are a California resident, please see our **"Notice to California Residents"** section below.

Objection (market research/direct advertising). You can object to the processing of your personal data for market research or for the purposes of direct advertising at any time. For this, please send an email to data.privacy@kaercher.com. Once you have objected, the personal data will no longer be processed for such purposes.

If you have any further questions regarding the processing of your personal data or if you would like information regarding the data concerning you that is stored, you can contact the Data Protection Officer of Alfred Kärcher SE & Co. KG at the address provided above or by emailing data.privacy@kaercher.com.

10. Competent Supervisory Authority

If you are located in the EU / EEA, as the data subject, you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you believe that the processing of personal data relating to you infringes these data protection regulations.

If you have a complaint relating to the use of your personal data, you can also contact the competent supervisory authority of Kärcher, the Baden-Württemberg Commissioner for Data Protection and Freedom of Information, Königstraße 10a, 70173 Stuttgart, Phone: [+49\(0\)711/615541-0](tel:+49(0)711/615541-0), Telefax 0711/615541-15, <https://www.baden-wuerttemberg.datenschutz.de/> Email: poststelle@fdi.bwl.de

11. Children's Privacy

The App is not intended for children under 18 years of age. We do not knowingly collect, use, sell, or share the personal data of consumers under 18 years of age.

12. Notice to California Residents

The California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”), requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and of the rights of California residents regarding their personal information. This section of the Privacy Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this section does not apply to you and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this “**Notice to California Residents**” section we will refer to this information as “Personal Information.”

Notice at Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated Date of this Privacy Policy, have collected the following categories of Personal Information:

- Identifiers (name, alias, online identifier, Internet Protocol address, email address, account name)
- Unique personal identifiers (device identifier; cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology; customer number, unique pseudonym or user alias; other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device)
- Commercial information (records of products obtained information regarding consumer’s use, management, and control of Kärcher Home Robots)
- Internet or other electronic network activity information (information regarding consumer’s interaction with the App)
- Geolocation data
- Audio, electronic, visual, or similar information
- Professional or employment-related information
- Sensitive Personal Information (account login (i.e., email address) and password; precise geolocation)

We collect Personal Information directly from California residents and from data analytics providers, business partners, vendors, and operating systems and platforms. We do not collect all categories of Personal Information from each source.

In addition to the purposes stated above in the section “**Purpose of the Processing and Legal Basis**” we currently collect and have collected the above categories of Personal Information for the following business or commercial purposes:

- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use
- Performing services, including maintaining or servicing accounts, providing customer service, verifying customer information, or providing similar services
- Providing advertising and marketing services, except for cross-context behavioral advertising, to you provided that, for the purpose of advertising and marketing, our service providers and/or contractors shall not combine the Personal Information of opted-out consumers that the service provider or contractor receives from us, or on our behalf with Personal Information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with you
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the device
- Advancing our commercial or economic interests, such as by enabling or effecting, directly or indirectly, a commercial transaction

Disclosure of Personal Information

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed Personal Information:

Category of Personal Information	Categories of Recipients
Identifiers Commercial information	Business partners; vendors who perform services on our behalf (e.g., hosting, maintenance, backup, analysis, etc.)
Unique personal identifiers	Data analytics providers
Internet or other electronic network activity information Geolocation data Audio, electronic, visual, or similar information Sensitive Personal Information	Vendors who perform services on our behalf (e.g., hosting, maintenance, backup, analysis, etc.)

We disclosed Personal Information for the above-listed business and commercial purposes.

We have not sold or shared Personal Information in the 12 months preceding the Last Updated Date of this Privacy Policy. We do not knowingly collect, sell, or share the Personal Information of consumers under 16 years of age. We do not use sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations.

Retention of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

Your Rights

If you are a California resident, you have the following rights with respect to your Personal Information:

- (1) The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which we collected Personal Information, the business or commercial purpose for collecting, selling or sharing Personal Information (if applicable), the categories of third parties to whom we disclose Personal Information (if applicable), and the specific pieces of Personal Information we collected about you;

- (2) The right to delete Personal Information that we collected from you, subject to certain exceptions;
- (3) The right to correct inaccurate Personal Information that we maintain about you;
- (4) If we sell or share Personal Information, the right to opt out of the sale or sharing;
- (5) If we use or disclose sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use or disclosure; and
- (6) The right not to receive discriminatory treatment by us for the exercise of privacy rights the CCPA confers.

How to Submit a Request to Know, Delete, and/or Correct

You may submit a request to know, delete, and/or correct by emailing us at privacy.us@karcher.com or by calling us toll free at 1-833-220-2420.

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

Our Process for Verifying a Request to Know, Delete, and/or Correct

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request. We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable. To do so, we will ask you to verify data points based on information we have in our records concerning you.

Right to Opt Out of Sale or Sharing of Personal Information

If you are a California resident, you have the right to direct us to stop selling or sharing your Personal Information. As noted above, we do not sell or share Personal Information as those terms are defined in the CCPA.

Shine the Light Law

We do not disclose personal information obtained through our App to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

13. Accessibility

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us via the address, phone or email set forth in Section 1 above.