

Robotify Labs Ltd

# Privacy Policy

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## PRIVACY POLICY

If you are a resident of the European Union (“EU”), United Kingdom, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this Privacy Policy, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Company will be the controller of your Personal Data processed in connection with the Services.

If you have any questions about this policy or whether any of the following applies to you, please contact us at [privacy@robotify.com](mailto:privacy@robotify.com). Note that we may also process Personal Data of our customers’ end users or employees in connection with our provision of services to customers, in which case we are the processor of Personal Data. If we are the processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

**What Personal Data Do We Collect From You?** We collect Personal Data about you when you provide such information directly to us, when third parties such as our business partners or service providers provide us with Personal Data about you, or when Personal Data about you is automatically collected in connection with your use of our Services.

Information we collect directly from you: We receive Personal Data directly from you when you provide us with such Personal Data, including without limitation the following:

- First and last name
- age
- User name
- Password
- Email address
- Customer token for credit/debit card information (note that the credit/debit card information will be stored on our third party payment processors, but we don’t collect nor store such information.)
- School name
- User Generated Content, for example, projects (including media) that you may create or upload through our Services. Users can create and maintain a portfolio of projects in their accounts, and publish some of them to share with other Robotify users. To better protect your Personal Data, we endeavor to reject the publication of Personal Data through the publication of project. If you are a teacher user, you may create projects or classrooms, upload student accounts, create showcases and also post questions in the forum, which can include Personal Data if you include Personal Data in such content.

Information we receive from third party sources: Some third parties such as our service providers, provide us with Personal Data about you, such as the following:

- **Account information for third party services:** If you interact with a third party service when using our Services, such as if you use a third party service to log-in to our Services (e.g., Facebook Connect or Twitter OAuth), or if you share content from our Services through a third party social media service, the third party service will send us information about you, such as first name, last name, email address and an authorization token, if the third party service and your account settings allow



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such sharing. The information we receive will depend on the policies and your account settings with the third party service.

• **IP Address from Google Analytics:** This helps to determine your city and country in order to provide localized and customized products and services to you.

Information we automatically collect when you use our Services: Some Personal Data is automatically collected when you use our Services, such as the following:

- IP address
- Device identifiers
- Web browser information
- Page view statistics
- Browsing history
- Usage information
- Transaction information (e.g. transaction amount, date and time such transaction occurred)
- Cookies and other tracking technologies (e.g. web beacons, pixel tags, SDKs, etc.) -- For more information, please review our Cookie Policy ([create hyperlink](#)).
- Location information (e.g. IP address, zip code)
- Log data (e.g. access times, hardware and software information)

**How Do We Use Your Personal Data?** We process Personal Data to operate, improve, understand and personalize our Services. For example, we use Personal Data to:

- Create and manage user profiles (we only do this to provide the services to our users. We do not use children's data for advertising or marketing purposes)
- Communicate with you about the Services
- Process orders
- Contact you about Service announcements, updates or offers
- Provide support and assistance for the Services
- Personalize website content and communications based on your preferences
- Meet contract or legal obligations
- Respond to user inquiries
- Fulfill user requests
- Comply with our legal or contractual obligations
- Resolve disputes
- Protect against or deter fraudulent, illegal or harmful actions
- Enforce our Terms of Service

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

• **Contractual Necessity:** We process the following categories of Personal Data as a matter of "contractual necessity", meaning that we need to process the data to perform under our Terms of Service with you, which enables us to provide you with the Services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Services that require such data.

• Account creation data (such as username, password, first name, age, parent email, parent name), when a user who is under the age of 16 provides such data to us in order to initiate email or push notifications to a person about whom such data is in order to get parental consent for the access to or purchase of additional services, as enabled by the functionalities built in our product and services. For example,

- A child under 16 asks a parent for permission to use our products or services;



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- A child under 16, who has access to our school-based products and services through his/her school, asks a parent to purchase home-based products and services or a paid subscription.
- **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties.
  - First and last name
  - Age
  - User name
  - Password
  - Email address
  - Mailing address
  - Telephone number
  - Credit/debit card information
  - School name
  - User generated content
  - Other user content
  - IP address
  - Device identifiers
  - Web browser information
  - Page view statistics
  - Usage information
  - Transaction information (e.g. transaction amount, date and time such transaction occurred)
  - Cookies and other tracking technologies (e.g. web beacons, pixel tags, SDKs, etc.) -- For more information, please review our Cookie Policy ([create hyperlink](#)).
  - Location information (e.g. IP address, zip code)
  - Log data

Examples of these legitimate interests include:

- Operation and improvement of our business, products and services
- For example, a child user may initiate a sharing of project he/she created via email to his/her parent or classroom, or we send progress email periodically to parents as their children complete projects.
- Marketing of our products and services
- Provision of customer support or responding to user inquiries or requests
- Protection from fraud or security threats
- Compliance with legal obligations
- Completion of corporate transactions
- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

**How and With Whom Do We Share Your Data?** We share Personal Data with vendors, third party service providers and agents who work on our behalf and provide us with services related to the purposes described in this Privacy Policy or our Terms of Service. These parties include:

- Payment processors
- Analytics service providers
- Staff augmentation and contract personnel



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- Hosting service providers

We also share Personal Data when necessary to complete a transaction initiated or authorized by you or provide you with a product or service you have requested. In addition to those set forth above, these parties also include:

- Other users (where you post information publicly or as otherwise necessary to effect a transaction initiated or authorized by you through the Services)
- Social media services (if you interact with them through your use of the Services)
- Third party business partners who you access through the Services
- Other parties authorized by you

We also share Personal Data when we believe it is necessary to:

- Comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies
- Protect us, our business or our users, for example to enforce our terms of service, prevent spam or other unwanted communications and investigate or protect against fraud
- Maintain the security of our products and services

We also share information with third parties when you give us consent to do so.

Furthermore, if we choose to buy or sell assets, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party, and we would share Personal Data with the party that is acquiring our assets. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Information as set forth in this policy.

**How Long Do We Retain Your Personal Data?** We retain Personal Data about you for as long as you have an open account with us and for twenty-four (24) months after you close your account or as otherwise necessary to provide you Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. Afterwards, we retain some information in a depersonalized or aggregated form but not in a way that would identify you personally.

**What Security Measures Do We Use?** We seek to protect Personal Data using appropriate technical and organizational measures based on the type of Personal Data and applicable processing activity. For example, we have put in place procures and policies designed to ensure that ( 1) our computer network is equipped with a firewall; (2) all access to the computer network and to each computer is subject to secure user authentication protocols; (3) access to any portion of the website containing Personal Data is password protected; and (4) Personal Data stored on our network is backed up on a regular basis in a manner which enables us to restore the availability and access to Personal Data promptly in the event of a physical or technical incident.

**Personal Data of Children:** We only collect personal information through the Services from a child under 16 where that student's school, district, and/or teacher has agreed (via the terms described in the [Terms of Use](#)) to obtain parental consent for that child to use the Services and disclose personal information to us or where the parent or legal guardian of a child has signed the child up to use the Services. If you are a student under 16, please do not send any personal information about yourself to us if your school, district, and/or teacher has not obtained this prior consent from your parent or guardian or if your parent or guardian has not signed you up to use the Service, and please do not send any personal information other than what we request from you in connection with the



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Services. If we learn we have collected personal information from a student under 16 without parental consent being obtained by his or her parent, guardian, school, district, and/or teacher, or if we learn a student under 16 has provided us personal information beyond what we request from him or her, we will delete that information as quickly as possible. If you believe that a student under 16 may have provided us personal information in violation of this paragraph, please contact us at [privacy@robotify.com](mailto:privacy@robotify.com).

**What Rights Do You Have Regarding Your Personal Data?** You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email [privacy@robotify.com](mailto:privacy@robotify.com). Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need to you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data. You can also access certain of your Personal Data by accessing the privacy control panel provided in our products and services.
  - **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by accessing the privacy control panel provided in our products and services. You can correct some of this information directly by sending us an email at [privacy@robotify.com](mailto:privacy@robotify.com).
  - **Erase:** You can request that we erase some or all of your Personal Data from our systems.
  - **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Services.
  - **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
  - **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
  - **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
  - **Right to File Complaint:** You have the right to lodge a complaint about Company's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State.
- Transfers of Personal Data:** The Services are hosted and operated in the United States ("U.S.") through Company and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Services, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Company in the U.S. and will be hosted on U.S. servers, and you authorize Company to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. as set forth herein.



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**What If You Have Questions Regarding Your Personal Data?** If you have any questions about this GDPR Privacy Notice or our data practices generally, please contact us using the following information:

**Physical address:** Talent Garden Dublin, D.C.U. ALPHA, FINGLAS ROAD OLD, D11 YNR2

**Email address for contact:** [privacy@robotify.com](mailto:privacy@robotify.com)

Designated representative and contact information

**Email:** [adam@robotify.com](mailto:adam@robotify.com)