

# ACCEL ROBOTICS CORPORATION

## PRIVACY POLICY

Accel Robotics Corporation (“Company”, “we”, “our”) is committed to protecting the privacy and security of users of our Website (<http://accelrobotics.com>) and cloud-based retail automation software and hardware as a service solution (the “Services”). This Privacy Policy sets forth how the Website and our Services collect and use personal information. By using the Website and Services, you acknowledge that you have read and accepted our privacy practices set forth below.

If you do not accept our privacy practices, then you should not continue to use either the Website or the Services. This Privacy Policy is incorporated by reference into and forms part of our Terms of Service.

### **1. ABOUT COMPANY**

Accel Robotics Corporation is a Delaware-based corporation with headquarters in La Jolla, California. Our offices are located at 2450 Executive Square, Suite 200, La Jolla, CA 92037.

### **3. PERSONAL INFORMATION WE WILL COLLECT**

We may collect your first and last name, email address, and phone number when you make an inquiry with us. We may also collect the IP address of your computer in order to gather analytics information from our Website on such data as the pages that you view, the links that you click, and the materials that you access.

We also may collect video data of your likeness in any location where our Services are deployed.

### **4. SENSITIVE PERSONAL INFORMATION**

We will not collect sensitive personal information about you, whether directly from you or from third parties. Sensitive information includes but is not limited to the following:

- (a) Personal information specifying medical or health conditions;
- (b) Personal information specifying racial or ethnic origin;
- (c) Personal information about political opinions;
- (d) Personal information about religious or philosophical beliefs;
- (e) Personal information about trade union membership; or
- (f) Personal information about sex life.

## **5. PURPOSES FOR WHICH WE WILL USE PERSONAL INFORMATION**

We make every effort to identify the purposes for which we will collect personal information at or before the time the information is collected. We will use your personal information only for the purposes disclosed at the time of collection or as otherwise set out in this Privacy Policy, unless we have your consent for another use, or unless such other use is authorized or required by law.

Our policy is to collect personal information from you for the following purposes:

- (a) to provide shopper activity data to our subscribers, business partners, and their customers;
- (b) to store and process shopper activity data using automated and semi-automated means in order to analyze actions you take at any such location for the delivery of our Services;
- (c) for the purposes of training our software systems;
- (d) to follow up with you after you have submitted an inquiry to us;
- (e) to generate analytics for the improvement of our Website and our software system;
- (f) to promote and market our Services to you;
- (g) to identify your needs and/or preferences;
- (h) to meet legal and regulatory requirements;
- (i) as otherwise required by law.

Video collection, processing, and provision of our Services use only anonymous data and de-identified non-persistent shopper id's that we will assign to you during each session.

## **6. WEB-BASED TRACKING TECHNOLOGIES WE WILL USE**

Other than the use of analytics technology on our Website, we do not currently employ any other web-based tracking technologies in our business. Should this change in the future, we will identify the technologies we use, how we use these technologies, how the technologies may affect you, and what you can do to modify or control them is explained in further detail in a separate cookie policy, which we will incorporate by reference.

## **7. SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES**

We do not rent, trade, or share personal information with third parties, except when we have your consent, or under the following circumstances:

- (a) We may share information with our third party cloud service providers, who host our data;

- (b) We may share your information with our third party contractors, who help us to deliver the Services;
- (c) We may share your likeness collected from our cameras with our subscribers and business partners and their customers;
- (d) We may share anonymized data on your purchases and data collected from our sensors with our subscribers, business partners, and their customers;
- (e) We may share analytics information with third parties in order to improve the quality or design of the Website and Services; to create new features, promotions, functionality, and services; and to maintain and upgrade the Website or Services.
- (f) We may share your personal information if required by law and if we believe that the disclosure is required or necessary to protect our rights and/or comply with a judicial processing or legal process served on us.
- (f) We may transfer personal information to a third party entity in the event of a merger or acquisition. You will be notified via email of any such change in ownership or control of personal information.
- (i) We may share personal information with our legal, financial, and other professional advisors.
- (k) We may share personal information with third parties upon receiving your consent as required by law.

Except as provided above, we will not share any of your information to any third party without permission.

## **8. SHARING PERSONAL INFORMATION WITH LAW ENFORCEMENT**

Please be advised that we are required to share personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **9. RETENTION PERIOD**

We will retain video data of your likeness for two (2) weeks, unless the data is included in a limited training set of data that we save for improving our system, in which case the data will be retained for only as long as is required for that purpose.

We will retain analytics data and personal information collected from inquiries for as long as is required to serve our business needs.

## **10. CONFIDENTIALITY AND SECURITY OF PERSONAL INFORMATION**

We have implemented commercially reasonable security measures such as anonymizing data, encrypting hard drives, installing firewalls on all development hardware and drives that store video, and adhering to best practices for Linux. We also follow generally accepted industry standards such as the use of 256-bit encryption, SSL and SSH protocols, and password protected logins on servers and local drives to protect personally identifiable information that we store as well as collect, both during transmission and afterwards.

However, despite our efforts to maintain the confidentiality and security of your information, no method of transmission over the Internet and no method of electronic storage is completely secure. Although we make every effort to protect your personal information, we cannot guarantee its absolute security.

## **11. CHILDREN**

We are committed to protecting the privacy of children. In furtherance of this commitment, we restrict the use of our Website to persons eighteen (18) years of age or older. We do not knowingly or intentionally collect personal information from children under the age of thirteen (13).

## **12. EMAIL AND PHONE COMMUNICATIONS**

We may use your email address and phone number to communicate with you to respond to an inquiry that you have directed to us and follow-up on other communication you submit to us.

We will never initiate a request for personal information by email or pop-up window. If you receive a request by email or pop-up window, please do not respond and notify us as set forth below.

If you ever believe that you have been a victim of fraud, please report it to the police and take all available actions to protect yourself. Also, please notify us, so that we can take all possible actions to protect you and the other visitors, registered users, and subscribers.

## **13. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION**

- (a) **Access Rights.** You have the right to review your personal information that we have collected in person at any time. To access your information, we require a written request submitted by email to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com). Upon receipt of any written request, we will take commercially reasonable steps to provide you with the opportunity to access such information.
- (b) **Transfer Rights.** You have the right to transfer any personal information that we have collected by requesting a copy in a commonly used format that can be imported by a third party. To make a transfer request, please submit your request to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com).

- (c) **Correction Rights.** You have the right to correct any personal information that we have collected, which is inaccurate or incorrect, to make a correction request, please submit your request to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com).
- (d) **Deletion Rights.** You have the right to delete any personal information that that we have collected and not already deleted two (2) weeks following the collection. To make a deletion request, please submit your request to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com).
- (e) **Right to Object.** You have the right to object to our continued storage, use, or sharing of your personal information. If you wish to object, You should follow the instructions provided in Section 15 below.
- (f) **Right to Withdraw Consent.** You have the right to withdraw consent at any time to our continued communications with you. To withdraw your consent, please submit your request to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com).
- (g) **California Resident Rights.** If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of your personal information with third parties for their own direct marketing uses. California law provides that you have the right to submit a request to us at our email address in order to receive information on the categories of customer information that we shared and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year. To obtain this information, please send an email message to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com) with a “Request for California Privacy Information” in the subject line and in the body of your message. We will provide the requested information to you in your email address in response.

Please be aware that not all information sharing is covered by the “Shine the Light” requirements and only information on covered sharing will be included in our response.

#### **14. CHANGES AND UPDATES TO THIS PRIVACY POLICY**

We may amend this Privacy Policy at any time at our sole discretion and without prior notice. If we make any material amendments, we will advise you about those changes by notifying you in a prominent place on our Website. You should check back with us from time to time in order to confirm that there have been no significant changes.

Please note that the use of information that we gather is subject to the Privacy Policy then in effect at the time of use.

#### **15. DATA TRANSFER, STORAGE & PROCESSING**

If you are accessing this Website from the European Union, Asia, or any other region with laws or regulations governing personal data collection, use, and disclosure that differ from United States laws, please be advised that your personal information will be transferred to, stored, and processed in the United States.

If we are transferring personal information out of the European Union, please be advised that we will take such measures as are necessary to ensure that the transfer is in compliance with the EU General Data Protection Regulation (Regulation 2016/679 also known as the “GDPR”), including but not limited to transferring the personal data to a recipient in the United States that has certified compliance with the EU-US Privacy Shield or to a recipient that has executed standard contractual clauses adopted or approved by the European Commission.

We acknowledge and agree that we are liable for all onward data transfers.

## **16. COMPLAINTS**

If you are unhappy with how we are processing your personal information and wish to make a complaint, you should submit your complaint to [privacy@accelrobotics.com](mailto:privacy@accelrobotics.com).

## **17. CONTACT US**

If you have any questions or concerns over this Privacy Policy or if you need further information regarding the access to your personal information, or how your personal information is used, you may contact us as listed below:

Attn.: Chief Privacy Officer  
Accel Robotics Corporation  
2450 Executive Square, Suite 200  
La Jolla, CA 92037  
[privacy@accelrobotics.com](mailto:privacy@accelrobotics.com)

## **18. EFFECTIVE DATE**

This Privacy Policy was last modified on August 8, 2018.