Vacuum Robot SILVERCREST SSRA1 – Data Privacy Policy

Revised: October 2019 Effective: October 2019

KSR Group GmbH (hereinafter "KSR") has committed itself to respect and to protect the privacy of its users. Therefore all users are called upon to read this Data Privacy Policy carefully before using the product.

The content of this Data Privacy Policy is the basis for the processing of personal data collected by KSR from the users. This Data Privacy Policy furthermore regulates how the users' data are protected, and which specific rights the users have with regard to their data. This Policy therefore applies to any form of business relationship between a user and KSR. Should adaptations of this Data Privacy Policy be necessary due to specific national laws, the specific Data Protection Policy or Data Protection Statement shall prevail over this Data Protection Policy.

Against this background, all users are called upon to read this Data Protection Policy carefully before using a concrete product of KSR.

Definitions

Vacuum robot: Refers to the vacuum robot with Internet access and data transmission capability produced and manufactured by KSR. This term explicitly refers to the vacuum robot purchased and used by you, hereinafter "SILVERCREST SSRA1".

Mobile app: Refers to an application developed by KSR and a third-party provider to connect to the Cloud platform and enable product operation and data presentation by the users.

User's personal data: Refers to the user's name, IP address, account number and password, which may be used alone or in combination with other data to identify the user data, as well as the time and location of use of the services by the user, hereinafter the "personal data".

Use: We collect data from the vacuum robots that you use for access to the service, as well as data concerning the vacuum robots. These include: IP address, type of robot used by you, and the code linked with your robot, for media access control.

How are Data Collected?

Collected data: Data that are explicitly provided or generated by use of the robot are collected by KSR during use of the services. These data are used both to be able to offer the services of KSR, but also to service and continuously improve these services. This is always done with comprehensive protection of the individual user account.

- Information about the user account: The user has to create an account in order to be
 able to use our products and services. When creating the account, the user is asked
 to provide an e-mail address, which is required for activation, administration or use
 of the KSR services. The provided user name and the profile picture will be linked
 with the user's account to facilitate access to the products and services.
- 2. The general data of the mobile phone are collected: model, operating system, unique device identifier, registration IP address, and the nature of access to the home network. This basic information is required for provision of the services.
- 3. Information about vacuum robots: During use of this product, all device information is registered so that the vacuum robot can be operated via a mobile app or even an intelligent personal assistant using an Amazon Echo device.
- 4. Image information captured by the smartphone camera is neither uploaded nor stored with the function "Scan QR code". Only the QR code that is displayed on the display of another smartphone and which is needed for sharing vacuum robots is scanned.
- 5. Users are explicitly asked not to transmit any confidential or sensitive data to KSR, such as race, ethnic background, political opinions, religion and other beliefs, health condition, genetic or biometric data, etc.

Use of Data

For what purpose are the data collected?

- 1. Warranty processes
- 2. Operation, administration and improvement of the mobile app and the associated services
- 3. Provision of services to the user
- 4. Compliance with legal and regulatory obligations for KSR

Disclosure of Data

In accordance with the provisions of this Data Privacy Policy, the user's data may be administrated or processed by service providers who host the web services or other IT systems of KSR, or on behalf of KSR in compliance with the statutory confidentiality and security regulations.

Security of Personal Data

KSR takes comprehensive precautions to protect the personal data from loss, misappropriation and misuse, as well as unauthorised access, disclosure, modification or destruction. To guarantee the security of the personal data, KSR has strict data security regulations and procedures and strictly implements the precautions set out above within the company.

Duration of Data Storage

In principle, the personal data is erased when it is no longer required. This is the case, for instance, when the personal data are no longer required for the purpose for which they were originally collected, or if there is reason to believe that the personal data are no longer up to date or invalid or incorrect. The data will in any case be erased if cancellation of the account is requested via the e-mail address support.lidl@ksr-group.com.

The personal data are in any case stored for as long as is necessary to fulfil statutory requirements (e.g. product liability) or statutory obligations to retain records.

During the term of data use, the user may examine his personal data in accordance with the applicable data protection regulations and demand erasure of the data sets via the email address support.lidl@ksr-group.com at any time.

Cancellation of the Account

During the use of the KSR services, the user may cancel his account at any time. To do this, the user must click on "Cancel account" under "Profile" in the app; the user is then asked to send an e-mail with the request for cancellation of the account to support.lidl@ksr-group.com. All personal data are erased when the user cancels the account:

Declaration of Consent

The user confirms that he has read, understood and accepted the entire contents of this Data Privacy Policy before agreeing to use of the KSR services or using them in an app.

The consent to data processing may be withdrawn at any time.

Further information is available from the Austrian data protection authority under www.dsb.gv.at.

For the sake of order it is pointed out that use of the services of KSR without or with incomplete consent to data processing in accordance with this Data Privacy Policy may lead to restriction of the services.

Information Right

If you have any questions or comments concerning our Data Protection Agreement or data processing, you can contact us at the following e-mail address: thomas.goerlitz@ksr-group.com (Data Protection Representative)

Revision of the Data Privacy Policy

This Data Privacy Policy is effective from publication on the website of KSR or affiliated companies. This renders any previous data privacy policies invalid.

Should an amendment to the Data Privacy Policy be necessary, this will be published on the website and is also available on request.

All aspects of use are regulated in the User Agreement (also available in the app).