

# DATA PROTECTION POLICY FOR WEBSITE

(Version: 5.7.2024)

## INTRODUCTION

Ecorobotix SA and its group companies worldwide ("**Ecorobotix**") understand that your privacy is important to you and that you care about how your Personal Data is used and shared online. We respect and value the privacy of everyone who visits this website, <https://ecorobotix.com/en/> ("**Website**") and (subject to the limited exceptions in section 5, below) we do not collect Personal Data about you unless you contact us (see section 6, below). Any Personal Data we do collect will only be used as permitted by law.

Please read this Privacy Policy ("**Policy**") carefully and ensure that you understand it. Your acceptance of the Policy is deemed to occur upon your first use of the Website. If you do not accept and agree with this Policy, you must stop using the Website immediately.

Your Personal Data will not be used nor shared with anyone except as described in this Policy.

## 1. DEFINITIONS AND INTERPRETATION

In this Policy, the following terms shall have the following meanings:

" <b>Cookie Policy</b> "	means the policy on cookies used by the Website, which may be retrieved from the following link: <a href="https://www.ecorobotix.com/en/wp-content/uploads/2025/02/20230829_Ecorobotix_Cookie-Policy_EN.pdf">https://www.ecorobotix.com/en/wp-content/uploads/2025/02/20230829_Ecorobotix_Cookie-Policy_EN.pdf</a> , as amended.
" <b>Data Privacy Law</b> "	means the data protection law applicable, from time to time, including, where applicable, the GDPR and/or the FADP.
" <b>FADP</b> "	means the Swiss Federal Act on Data Protection, as amended
" <b>GDPR</b> "	means the European regulation 2016/679, called the General Protection Data Regulation, as amended.
" <b>Personal Data</b> "	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means Personal Data that you give to us via the Website. This definition shall, where applicable, incorporate the definitions provided in FADP and the GDPR.

<b>"Processing"</b>	means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. <b>"Process"</b> shall be construed accordingly.
<b>"Third Country"</b>	means a country outside Switzerland and, respectively, the EEA not recognized by the Swiss Federal Council and/or the European Commission as providing an adequate level of protection for personal data (as described in the FADP and the GDPR, as applicable).
<b>"we/us/our"</b>	means Ecorobotix SA, Rue Galilée 6, 1400 Yverdon-les-Bains, Switzerland.

## 2. WHAT DOES THIS POLICY COVER?

This Policy applies only to your use of the Website. The Website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 3. ON WHICH LEGAL BASIS DO WE RELY TO PROCESS YOUR PERSONAL DATA

In respect of each of the purposes for which we use your Personal Data, we ensure that we have a legal basis for that use. As a general rule, we rely on one of the following legal bases:

- Performance of a contract: the Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- Compliance with a legal obligation: the Processing is necessary for compliance with a legal obligation to which we are subject;
- Legitimate interest: the Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (which is not overridden by your data protection interests); or
- Your consent: we may also rely on your consent as a legal basis for Processing your Personal Data for the specific use for which you have given such consent. If we do rely on your consent to a use of your Personal Data, you can withdraw your consent at any time. However, the withdrawal of consent will not affect the legality of the Processing up to the withdrawal. If you wish to withdraw your consent, please contact: [legal@ecorobotix.com](mailto:legal@ecorobotix.com).

#### **4. YOUR RIGHTS**

- 4.1. As a data subject, you have the following rights under the FADP and/or GDPR:
- 4.1.1. The right to be informed about our collection and use of Personal Data;
  - 4.1.2. The right of access to the Personal Data we hold about you (see section 5);
  - 4.1.3. The right to rectification if any Personal Data we hold about you is inaccurate or incomplete (please contact us using the details in section 10);
  - 4.1.4. The right to be forgotten – i.e. the right to ask us to erase any Personal Data we hold about you;
  - 4.1.5. The right to restrict (i.e. prevent) the Processing of your Personal Data;
  - 4.1.6. The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);
  - 4.1.7. The right to object to us using your Personal Data for particular purposes;
  - 4.1.8. Rights with respect to automated decision making and profiling; and
  - 4.1.9. The right to withdraw your consent at any time (where we are relying on consent to process your Personal Data).
- 4.2. If you have any cause for complaint about our use of your Personal Data, please contact us using the details provided in section 10 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the Swiss Federal Data Protection and Information Officer ("**FDPIC**") and/or any competent EU supervisory authority (as the case may be).

#### **5. WHAT DATA DO WE COLLECT?**

- 5.1. We do place cookies on your computer or device. In this context, please refer to our Cookie Policy [https://www.ecorobotix.com/en/wp-content/uploads/2025/02/20230829\\_Ecorobotix\\_Cookie-Policy\\_EN.pdf](https://www.ecorobotix.com/en/wp-content/uploads/2025/02/20230829_Ecorobotix_Cookie-Policy_EN.pdf).
- 5.2. If you send us an email, we may collect your name, your email address, and any other information which you choose to give us.

#### **6. HOW DO WE USE YOUR PERSONAL DATA?**

- 6.1. If we do collect any Personal Data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the FADP and/or GDPR at all times. For more details on security see section 7, below.

- 6.2. As noted above, we do not generally collect any Personal Data. If you contact us and we obtain your personal details from your email, we may use them as follows:
- 6.2.1. to allow you to communicate with us;
  - 6.2.2. to send you our newsletter and other marketing communication if you accept to receive such newsletter and marketing communication;
  - 6.2.3. to improve the Website and perform research and analysis;
  - 6.2.4. to ensure and enhance the security of the Website;
  - 6.2.5. for the purposes set forth in the Cookie Policy; or
  - 6.2.6. to fulfill other purposes for which you provide the data.
- 6.3. You have the right to withdraw your consent to us using your Personal Data at any time, and to request that we erase it. However, the withdrawal of consent will not affect the legality of the Processing up to the withdrawal. If you wish to withdraw your consent, please contact: [legal@ecorobotix.com](mailto:legal@ecorobotix.com).
- 6.4. As a general principle, we do not sell your Personal Data to third parties. We may however use non personal data derived from your Personal Data for our internal use or any legitimate commercial purpose, provided that such data shall be used in an aggregate and anonymized or pseudonymized form. As such data will not relate to you, they are no longer covered by the Data Privacy Law.

## **7. HOW AND WHERE DO WE STORE YOUR PERSONAL DATA?**

- 7.1. We only keep your Personal Data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.
- 7.2. Your data will only be stored within the following countries: Switzerland, Belgium (ERP Odo), United States (Mailchimp, Hubspot and Zendesk), Germany (Hubspot, Zendesk and AWS), Ireland (Zendesk and AWS) and Italy (AWS).
- 7.3. We generally do not transfer your Personal Data to third parties located in Third Countries. However, if we should effect a transfer of your Personal Data to such third parties, we will do so either based on your explicit consent and/or by making a contractual arrangement with the third-parties or taking any other adequate safeguard in accordance with the requirements set by the applicable data protection laws such as the conclusion of the EU Standard Contractual Clauses (SCCs).
- 7.4. By providing us with your Personal Data, you agree that we may transfer, store and process your Personal Data outside of Switzerland, the EU and the EEA – in particular in the USA – and acknowledge that governments in certain countries such as the USA have broad powers to access data for security, crime prevention and detection and law enforcement purposes.

## **8. HOW DO WE PROTECT YOUR PERSONAL DATA?**

- 8.1. We exercise commercially reasonable efforts to prevent unauthorized exposure or disclosure of your Personal Data. In particular, we implement and maintain measures (comprising administrative, physical, and technical safeguards) for managing unauthorized disclosure or exposure of your Personal Data.
- 8.2. In the event of a data breach, or in the event that we suspect a data breach, we will (i) do our best efforts to promptly notify you, where technically feasible, and (ii) cooperate with you to investigate and resolve the data breach, including without limitation by providing reasonable assistance to you in notifying injured third-parties. We will give you prompt access to such records related to a data breach as you may reasonably request; provided that we shall not be required to provide you with records belonging to, or compromising the security of, other users.
- 8.3. In the event of a data breach, or in the event that we suspect a data breach, we will in addition notify the competent authorities in accordance with applicable law.

## **9. HOW CAN YOU ACCESS YOUR PERSONAL DATA?**

You have the right to ask for a copy of any of your Personal Data held by us (where such data is held). Please contact us for more details at [legal@ecorobotix.com](mailto:legal@ecorobotix.com).

## **10. HOW TO CONTACT US?**

If you have any questions about the Website or this Policy, please contact us by email at the following address:

Name: Ecorobotix SA  
Address: rue Galilée 6, 1400 Yverdon-les-Bains, Switzerland  
Attn: Data officer  
E-mail: [legal@ecorobotix.com](mailto:legal@ecorobotix.com).

Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## **11. CHANGES TO OUR POLICY**

We may change this Policy from time to time (for example, if the law changes). Any changes will be immediately posted on the Website and you will be deemed to have accepted the terms of the Policy on your first use of the Website following the alterations. We recommend that you check this page regularly to keep up-to-date.