



ECOROBOTIX PRIVACY POLICY

(Version: September 1, 2025)

INTRODUCTION

Ecorobotix SA and its group companies worldwide ("**Ecorobotix**"; "**we**", "**our**" and/or "**us**") understand that your privacy is important to you and that you care about how your Personal Data is used and shared.

This privacy policy (the "**Policy**") applies to all visitors of our Website (www.ecorobotix.com) as well as to all customers or users of our Service and Machine. This Policy does not apply to our relationship with our employees, suppliers, distributors, resellers and other business partners.

Please read this Policy carefully and ensure that you understand it. Your acceptance of the Policy is deemed to occur upon your first use of the Service and/or your acceptance of an End-User Agreement. If you do not accept and agree with this Policy, you must stop using the Service immediately. Any Personal Data we do collect will only be used as permitted by law.

1. DEFINITIONS

In addition to the terms elsewhere defined in this Policy, the following terms shall have the following meanings for all purposes of this Policy:

"Applicable Law" means any law, statute, ordinance, regulation, rule, code, treaty, order, judgment, writ, injunction, act, decree, decision, ruling, award or other requirement having the force of law of any Governmental Authority.

"ARA Sprayer" means the towed high precision sprayer manufactured by Ecorobotix and sold under the name "ARA".

"Authorized Partner" means an Ecorobotix authorized reseller or distributor authorized by Ecorobotix to sell the Machines, as well as the subcontractors and service providers of Ecorobotix.

"Cloud Service" means one or more of Ecorobotix's cloud-based service offerings that are made available to end-user, including their associated components, content, updates, and upgrades thereto (including any output of the Cloud Services, such as reports and statistics).

"Controller" means the natural or legal person which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data.

"Cookie Policy" means the cookie policy, which may be retrieved from the following link: <https://ecorobotix.com/en/cookies-policy>.

"Data Protection Law" means any applicable law or regulation relating to the protection of Personal Data, including, within their respective scope of application, the FADP, the GDPR and the implementing acts of the Regulation by the member states of the European Union and/or.

"Ecorobotix SA" means Ecorobotix SA, a Swiss company organized under the laws of Switzerland, with its registered office at Rue Galilée 6, 1400 Yverdon-les-Bains, Switzerland, registered with the commercial register of the canton of Vaud under the business identification n° CHE-284.375.582.

"EEA" means the European Economic Area.

"End-User Agreement" means the end-user agreement entered into by Ecorobotix and end-users of



the Machine, in substantially the form and essence set forth in the document which may be retrieved from <https://ecorobotix.com/en/eula>, as amended and restated from time to time.

"FADP" means the Swiss Federal Act on Data Protection, as amended.

"GDPR" or **"Regulation"** means the EU General Data Protection Regulation 2016/679 and the implementing acts of the Regulation by the member states of the European Union, as amended.

"Governmental Authority" means any foreign, domestic, federal, territorial, supranational, national, state or local governmental authority, quasi-governmental authority, instrumentality, court, government or self-regulatory organization, commission, tribunal or organization or any regulatory, administrative or other body or agency, or any political or other subdivision, department or branch of any of the foregoing.

"Group" means Ecorobotix SA and the other Group Companies.

"Group Companies" means, as at the date of this Policy, Ecorobotix SA, Ecorobotix Inc. (USA) and Ecorobotix France S.A.S. (France).

"Machine(s)" means the ARA Sprayer and any other products commercialized under the brand "Ecorobotix" or any other brand owned by Ecorobotix.

"Personal Data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. This definition shall, where applicable, incorporate the definitions provided in the applicable Data Protection Law.

"Policy" means this privacy policy, which may be retrieved from the Website, as amended.

"Processing" 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. The term **"process"** shall be construed accordingly.

"Processor" means the person which processes Personal Data on behalf of the Controller.

"SCC" means standard contractual clauses approved by the relevant Governmental Authority as a valid mechanism for international transfer of Personal Data, including standard contractual clauses adopted by the European Commission that are stated in the Annex to the European Commission's Implementing Decision 2021/914 of 4 June 2021, available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914> ("**EU SCCs**"), as may be amended to be adapted for Swiss law, and the UK International Data Transfer Addendum to the EU SCCs, available at: <https://ico.org.uk/media2/migrated/4019539/international-data-transfer-addendum.pdf>. These links may be updated from time to time based on updates by regulatory authorities and will be updated by amendment to this Policy.

"Service" means the Website, the Software and the Cloud Service.

"Software" means the operating software embedded in the Machine and/or any accessories (including the tablet) used, among other things, for control and monitoring of the Machine.

2. HOW TO CONTACT US

If you have any issues or queries relating to our Processing of your Personal Data and/or this Policy more generally, you may contact us at the following address:

Name: Ecorobotix SA
 Address: rue Galilée 6, 1400 Yverdon-les-Bains, Switzerland
 Attn: Data protection officer
 E-mail: privacy@ecorobotix.com

3. WHAT PERSONAL DATA WE COLLECT

3.1. Personal Data you provide to us

There are many occasions when you provide information that may enable us to identify you personally while using the Service. The Personal Data we may collect from you is outlined in the table below. Such data will be considered Personal Data to the extent they can be linked to a natural person.

Identification Information	Information allowing us to identify you such as full name, title, gender, date of birth, address, phone and fax numbers, e-mail addresses, company name, administration number, name of employees, representatives and account login information.
Financial Information	Any information that we or the payment platform need(s) to fulfil an order or that you use to make a purchase, in connection with a warranty or otherwise; bank accounts detail; KYC data; AML data; mortgage date; data received by credit agencies; source of wealth or any other information received from you.
Contractual Information	Any information relating to an agreement between you and us or an Authorized Partner, such as an End-User Agreement, including your contact details, financial information, terms of agreement, as well as any correspondence relating to such agreement.
Communication Data	Any information you provide us when you directly contact us, such as your name, email, location information (e.g., country), the contents of your message or attachments that you may send us, and any other information you choose to provide.
Customer Generated Content	Any content that you create and then share with us on third party social network or by uploading it to the Service such as photos, videos, personal stories or other similar media or content, participation in surveys or contacting our customer or support service.
Agronomic Data	The data that you provide us in relation to the use of the Machine, such as the crops to be treated and the products applied on the crops.

3.2. Personal Data we collect when you use our Machines

Agronomic Data	The data collected by the Machine, such as geolocation data and other data (e.g. acreage, crop type, number of acres treated by the Machine), as well as the images captured by the Machine.
Machines Related Data	The data of a technical nature which directly relate to the Machines, their performance, usability, safety, maintenance, malfunction and troubleshooting.

3.3. Personal Data received from third party sources

We may also collect certain of your Personal Data from third party sources, some of which may not be publicly available. Examples of these sources are broken down in the table below.

Third party data source	Category(ies) or other types of Personal Data received
Authorized Partners (distributors and resellers)	Identification Information Financial Information Contractual Information relating to your agreement with the Authorized Partner Communication Data and data exchanged with the support service of an Authorized Partner, such as Machines Related Data.



Information from Cookies and Other Tracking Technologies	We and our third-party partners collect information about your activities when using our Services by way of cookies, pixel tags, SDKs, or other tracking technologies. Our third-party partners, such as analytics, advertising, and security partners, may also use these technologies to collect information about your online activities over time and across different services. Please review our full Cookies Policy for more information.
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4. FOR WHICH PURPOSES WE PROCESS YOUR PERSONAL DATA

We may process your Personal Data for various purposes, including:

- to allow you to communicate with us;
- to deliver the Machines and to provide maintenance and support services to you or to enable our Authorized Partners and others to provide maintenance and support services;
- to enable us and the Authorized Partners to calculate and record income and expenses, making payments and collecting claims from customer;
- to improve the Service and our Machines and perform research and analysis;
- to train, develop, and improve the artificial intelligence, machine learning, and models used in our Machines and in the Service;
- to ensure and enhance security of the Service;
- to personalize your experience on our Services, such as by providing tailored recommendations;
- to generate anonymized or aggregate data containing only de-identified, non-Personal Data that we may use for any lawful purposes, such as to publish reports;
- to carry out a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets (a "M&A");
- for marketing and advertising purposes, such as to send you our newsletter and other marketing communication if you accept to receive such newsletter and marketing communications;
- to propose new or other Ecorobotix products and services;
- to perform survey for customer and user feedback;
- to fulfill other purposes for which you provide the data.

No commercial use of Personal Data

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 Protection Law.

5. 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 purposes for which you have given such consent. If we do rely on your

consent to use 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: privacy@ecorobotix.com.

6. WITH WHOM WE SHARE YOUR PERSONAL DATA

We may share Personal Data to the following categories of recipients to the extent permitted by the applicable Data Protection Law:

Intragroup transfers	Your Personal Data may be transferred between Ecorobotix SA and other Group Companies for any of the purposes described in this Policy and in accordance with the terms of an intra group data transfer agreement (which includes the SCC).
Authorized Partners (distributors and resellers)	We may share certain Personal Data of end-users and customers with our distributors or resellers to the extent necessary to allow the delivery and to operate the Machines, as well as in connection with a warranty and other support services. We may also share with the distributor or reseller of a Machine certain information relating to such Machine, in particular the use of a Machine (such as the surface treated and the algorithms used) so as to enable our Authorized Partner to calculate and record income and expenses. Agronomic data and Machine related data may also be shared with our Authorized Partners, either on an anonymized basis or with the consent of the data subject concerned, to allow them to propose you new or additional services or products from Ecorobotix.
Authorized Partners (service providers)	We may give service providers appointed by any Group Companies access to the Personal Data in order to assist us with the operation of our Service (such as trustees, IT-providers, etc.) or our dedicated pages on social media.
Authorized Partners (AI service providers)	We may disclose information we receive to vendors that provide artificial intelligence services that provide backend support for our Services.
Analytics Partners	We use analytics services, such as Google Analytics, to collect and process certain analytics data. You can learn more about Google's practices by visiting https://www.google.com/policies/privacy/partners/ . Please also read our Cookies Policy .
Legal and Taxing Authorities, Regulators and Participants in Judicial Proceedings	It is possible that we will need to disclose your Personal Data when required by law or if we have a good faith belief that disclosure is necessary to: (i) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist Governmental Authority; (ii) enforce our agreements with you; (iii) investigate and defend ourselves against any third-party claims or allegations; (iv) protect the security or integrity of the Service or our dedicated pages on social media; or (v) exercise or protect the rights and safety of our users, personnel, or others.
Acquirers and related parties in a M&A transaction	In the event of a M&A transaction, we may transfer your Personal Data to service providers, advisors, potential transactional partners, or other third parties in connection with the negotiation or completion of the M&A transaction.

If you request that we amend or delete your Personal Data as described in Section 10 (Your Rights Relating to Your Personal Data) of this Policy, we will take reasonable steps to communicate your request to any third-party with whom we have shared your Personal Data in accordance with applicable Data Protection Law. However, please note that we cannot guarantee the amendment or deletion of Personal Data that has been independently collected or processed by third parties, including those who

may have received your information through lawful means under this Policy, or to whom you have directly disclosed such information (e.g., by sharing login credentials or otherwise).

7. HOW LONG WE STORE YOUR PERSONAL DATA

We will retain your Personal Data for as long as necessary, particularly to fulfil our contractual obligations, comply with our legal obligations or resolve disputes.

Unless we have a legal obligation or another legal basis to keep them longer, we will generally retain Personal Data as follows:

Information	Starting point	Duration
Identification Information	Last contact/use of the Service/termination of the account	6 months
Payment Information	Expiration of the financial year which they concern	6 months
Contractual Information, Communication Data, Customer Generated Content, Machines Related Data and other information which are relevant for our financial statements or to assert our rights and perform our obligations under a contract with you	Termination or expiration of the End-User Agreement or relevant agreement or end of the business year during which the communication took place, whichever is later.	10 years
Contractual Information, Communication, Customer Generated Content, Machines Related Data and other information which are <u>not</u> relevant for our financial statements or to assert our rights and perform our obligations under a contract with you	Supply or collection of the Personal Data	6 months
Agronomic Data	Termination of End-User Agreement	1 year after termination of the End-User Agreement
Information from Cookies and Other Tracking Technologies	Visit of the Website	The retention period of cookies depends on the type of cookies. Session cookies are stored for the duration of your session. Other persistent cookies will as a rule be retained for 6 to 12 months, unless you withdraw your consent before the end of such retention period. Analytics are generally retained during 25 months.

With respect to newsletter and other marketing information, we will delete your subscription as soon as reasonably possible after your request.



Upon your request, we will delete, pseudonymize or anonymize your Personal Data so that you can no longer be identified, unless we are legally authorized or required to retain certain data. This may apply in the following circumstances:

- (i) **Outstanding Issues:** If there is an unresolved issue with your account, such as an outstanding debt or an unresolved claim or litigation, we will retain the necessary Personal Data until the issue is resolved;
- (ii) **Legal Obligations:** If we are required to retain Personal Data as a result of legal, tax, auditing and accounting obligations, we will retain the necessary Personal Data for the period required by the Applicable Law; and/or
- (iii) **Legitimate Interests:** If retention is necessary for our legitimate interests - such as fraud prevention or ensuring the security of our users - we may retain the relevant data, provided these interests are not overridden by your legitimate interests or fundamental rights and freedom.

We reserve the right to retain for an unlimited period of time information derived from your Personal Data in such way that you will no longer be identified or identifiable (anonymized or pseudonymized data).

8. WHO IS THE CONTROLLER OF THE PERSONAL DATA

Unless indicated otherwise in this Policy, Ecorobotix SA is the Controller of the Personal Data directly collected by Ecorobotix or any Group Company from you (Section 3.1) or through the Service (Section 3.2). As regards the Personal Data supplied to us by our Authorized Partners, we are generally only a Processor, whilst the Authorized Partner is the Controller, unless indicated otherwise. Please therefore refer to the privacy policy of the Authorized Partner who has sold the Machine to you which will describe the way it will process your Personal Data.

9. INTERNATIONAL TRANSFER OF PERSONAL DATA

You acknowledge that Ecorobotix may process and disclose/transfer Personal Data to third parties as listed under Section 6 above located in countries outside of Switzerland, including to EEA countries and the United States, and anywhere else in the world where Ecorobotix and its Processors maintain data processing operations. Ecorobotix shall at all times ensure that such transfers are made in compliance with the requirements of the applicable Data Protection Law and this Policy.

Where Personal Data is transferred from Switzerland or another origin country to a country that is not recognized as providing an adequate level of data protection as recognized by the relevant Governmental Authority of the origin country, we ensure that appropriate safeguards are in place, such as (i) a valid certification, such as the Swiss-U.S. Data Privacy Framework ("**Swiss-U.S. DPF**"), the EU-U.S. Data Privacy Framework ("**EU-U.S. DPF**") and/or the UK Extension to the EU-U.S. DPF or (ii) SCC.

A list of third party Processors and their locations can be provided upon request to privacy@ecorobotix.com.

10. YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

10.1. Your rights under this Policy

In addition, you have the right under this Policy to:

- **Request access to your Personal Data.** This enables you to obtain a confirmation from us whether or not your Personal Data is being processed by us and, as the case may be,

to receive a copy of your Personal Data we hold about you and to check that we are lawfully processing it.

- **Request correction of the Personal Data** that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your Personal Data.** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You will have such right when (i) your Personal Data is no longer necessary for the purposes for which it has been collected, (ii) you exercise your right to oppose the Processing concerned, or (iii) the Processing is not legal. Your right to erase cannot be asserted if we must retain Personal Data in order to comply with a legal obligation or to exercise rights in court.
- **Object to the Processing of your Personal Data.** This right exists where we are relying on a legitimate interest as the legal basis for our Processing and there is something about your particular situation, which makes you want to object to the Processing of your Personal Data on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- **Request the restriction of the Processing of your Personal Data.** This enables you to ask us to suspend the Processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your Personal Data.** Upon your request, we will provide to you, or a third party you have chosen, the Personal Data you have provided to us in a structured, commonly used, machine-readable format (such as CSV; XML or JSON) where it is technically possible. This right applies only when the processing is based on consent or the performance of a contract, and is carried out by automated means.
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of our Service. We will advise you if this is the case at the time you withdraw your consent.
- **Lodge a complaint** with the competent authority of the country in which you have your habitual residence if you consider that the Processing of your Personal Data violates the applicable Data Protection Law.

10.2. How to exercise your rights?

If you want to exercise any of the rights described above, please contact privacy@ecorobotix.com.

Typically, you will not have to pay a fee to access your Personal Data (or to exercise any of the other rights described above). However, except in relation to a consent withdrawal, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances. Before applying such fee and answering your request, we will inform you on the costs involved.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



11. HOW WE PROTECT YOUR PERSONAL DATA

We implement appropriate technical, contractual and organisational measures to protect personal data notably against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

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.

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.

12. CHILDREN'S PRIVACY

We do not knowingly collect, maintain, or use personal information from children under 18 years of age, and no part of our Service is directed to children. If you learn that a child has provided us with Personal Data in violation of this policy, then you may alert us at privacy@ecorobotix.com.

13. UPDATE YOUR INFORMATION

You can update your account information or close your account via your profile settings.

14. CHANGES TO OUR POLICY

We may change this Policy from time to time. Any changes will be immediately posted on the following link <https://ecorobotix.com/en/general-privacy-policy> and you will be deemed to have accepted the terms of the Policy on your first use of the Service following the alterations. We recommend that you check this page regularly to stay up to date.