Roborock Privacy Policy

Our Privacy Policy was updated and became effective on Thursday, January 13, 2022. In this Privacy Policy, we have deleted the description of the information that will no longer be collected based on our business needs and have optimized some of the text. If you no longer wish to use our services, you can request your account to be deleted by sending an email to privacy@roborock.com (or privacy@roborock-eu.com if you are a European Union user under the General Data Protection Regulation (GDPR) or a Russian user under the Russian Federal Law on Personal Data or applicable laws).

Starting from the effective date, you may refer to this Privacy Policy for details on how we manage your personal information that you disclose during your use of our Roborock app (the "App"), in addition to the privacy polices that we develop for specific products or services. Please take some time to familiarize yourself with our privacy practices. If you have any questions, please let us know by contacting us at privacy@roborock.com (or privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws).

Our Commitments to You
This Privacy Policy explains how Beijing Roborock Technology Co., Ltd. and its affiliates ("Roborock", "we", "us", or "our") collect, use, disclose, process, and protect the information you provide to us when using the App. If we ask you for certain information to verify your identity when you use Roborock products and services, we will use such information in strict accordance with this Privacy Policy and/or our User Agreement.

This Privacy Policy has been designed with you in mind, and it is important that you have a full understanding of our personal information collection and usage practices and feel assured that you have ultimate control over your personal information provided to Roborock.

In this Privacy Policy, "personal information" means any information that can be used alone or in combination with other information about an individual to which Roborock has access to identify that individual. Such personal information includes, but is not limited to, information about you and your device that you upload.

By using the App, you agree and acknowledge that you have read and accept all of the terms of this Privacy Policy, including any changes that we may make from time to time. To comply with applicable laws, including local data protection legislation (such as the GDPR and the Russian Federal Law on Personal Data), we will specifically seek your prior explicit consent to the processing (such as automated decision-making) of special categories of personal information. Furthermore, we are committed to protecting the privacy, confidentiality, and security of your personal information in accordance with applicable laws, and we are equally committed to ensuring that all of our employees and agents comply with these obligations.

Our ultimate goal is to provide the best experience for all users. If you have any questions about the data processing practices described in this Privacy Policy, you can contact us by email at privacy@roborock.com (or privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws) so that we can process your special requests. We are happy to deal with your questions directly.

What Information We Collect and How We Use It

Types of information collected

To provide you with our services, we will ask you for your personal information that is necessary for the provision of these services. If you do not provide your personal information, we may be unable to provide you with our products or services.

To help you a have a better understanding of this Privacy Policy, some common terms used in this Privacy Policy are defined as follows:

Mobile device: Any device where the App runs, such as a mobile phone or a tablet.

Device: Any smart device that can access the IoT platform through the App, such as a Roborock vacuum cleaner.

We will only collect information that is necessary for specific, explicit, and legitimate purposes and will not further process it for any other purposes. We may collect the following types of information (which may or may not be personal information):

Information that you provide to us (including your contact information): We may collect the personal information that you provide to us, such as your mobile phone number, email address, feedback, the profile picture you upload in the App, and other information you enter. As your mobile phone number and email address are crucial to you logging in to the App, they will be stored on the mobile device on which the App runs. If you wish to delete that information, you can choose to delete your account. For information on how to delete your account, refer to "Deleting information" below.

Mobile device information and App running information: We may collect information about the mobile device where the App runs, such as the system version, language setting, time zone setting, the manufacturer of the device, the device model and name, and the IP address. We may also collect information about the cellular network operator that your mobile device is registered with. We may further collect information about the crashes of the App.

Device information: We may collect information about the device linked to your account, such as the device's MAC address, DID (a serial number used for a smart device), device's network information (IP address/network signal), firmware version, and the MAC address of the router concerned.

Coarse location information (required only for specific services/functions): information relating to your location, including your area and country code.

Network access information: the SSID and password of the router concerned. Please note that your password will only be stored on your Device and will not be uploaded to our server.

Account credentials: information about your account credentials, such as the account username, password, and token (used for account login).

How This Personal Information Will Be Used

We collect your personal information to provide you with our products and/or services and ensure that we comply with applicable laws. You hereby agree that we may process your personal information and disclose your personal information to our affiliates and third-party service providers (as defined below) for the purposes stated in this Privacy Policy.

We may use your personal information for the following purposes:

To provide, process, maintain, improve, or develop our products and/or services provided to you, as

well as services provided via your device or the App.

To communicate with you about your device, our services, or any general queries, such as updates, upgrades to device firmware/software, customer inquiry support, relevant information, and notifications.

To analyze and develop statistical information about the use of our products and services in order to improve our products and services.

To store and maintain information about you that is related to our business operations or legal obligations.

To provide local services without communicating with our servers.

More details on how we use your information, possibly including your personal information, are provided below:

To create your Roborock account. Your mobile phone number, email address, or third-party account information collected when you create your account on the webpage or your mobile device is used to create your personal account and profile page. The profile picture you upload is only for display on your profile page.

To guarantee the implementation of the basic features of the App and your device. We collect your login information to ensure the implementation of the basic features of the App and collect information about your device linked to your account to ensure the implementation of the basic features of the device.

To provide location-based services. We may use rough location information to help identify the data center to which your device and mobile device are connected.

To ensure device access. Where the use of your device requires a network connection, you need to configure a network for your device via the App by entering your Wi-Fi name and password. This information is only used in combination with your time zone settings, rough location information, username, and token for configuring a network for your device. You can clear your Wi-Fi name and password at any time by resetting your device or removing the App.

To display the status of your device. You are allowed to view the status of your device remotely.

To provide a push service. Your account is used for sending device and system notifications to you.

To verify your identity. The App uses your password to verify your identity in order to prevent any unauthorized login.

To stay logged in. A token is used to help you stay logged in. This means you no longer need to enter your login information again when you re-enter the App after exiting it.

To collect user feedback. Your feedback is of great value to us as it will help us improve our services and allow us to assist you in solving any problems that you encounter during your use. In order to

track the feedback you provide, your username, feedback you enter, and the model and system version of your mobile device will be retained on our server.

To provide a firmware upgrade feature. You will be reminded to upgrade the firmware based on the firmware version information of all devices linked to your account via the App when there is an upgrade package available.

To improve our products and services. We will use information about your mobile device and the functioning of the App to improve our products and services.

With Whom We Share Your Information
We will not sell any personal information to third parties.

We may sometimes disclose your personal information to third parties (as defined below) to provide the products or services that you have requested.

Disclosure may be made to Third-Party Service Providers and affiliates listed in this section below. In each case described in this section, you can be assured that Roborock will share your personal information only with your authorization. Your authorization granted to Roborock also applies to sub-processors which process your personal information. You acknowledge that when Roborock shares your personal information with a Third-Party Service Provider under any circumstance described below, Roborock will contractually specify the practices and obligations of such third party in accordance with applicable local data protection laws. Roborock will contractually ensure compliance by Third-Party Service Providers with the privacy standards that apply to them in your jurisdiction.

Sharing information with our affiliates and Third-Party Service Providers
To ensure smooth business operations and provide you with the full range of product and service features, we may disclose your personal information to our affiliates (including those that help us manufacture or sell products or provide after-sales services) or third-party service providers in collaboration with us (including providers of mail or delivery services, telecoms companies, or providers of data center, data storage facility, technical support, customer support or IoT services). Such Third-Party Service Providers may process your personal information on behalf of Roborock or for one or more of the purposes described above. If you no longer wish us to share your personal information, please email us at privacy@roborock.com (or at privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws) to request the deletion of your account, or please withdraw your consent to our information sharing activity. (Refer to the following for details on how to withdraw consent.)

Information not requiring your consent
For the avoidance of doubt, Roborock will collect, use, or disclose your personal information without your consent only to the extent it is explicitly allowed under local data protection laws.

Safeguards
Roborock's security measures
We are committed to ensuring that your personal information is secure. To prevent any unauthorized access, disclosure, or other similar risks, we have put in place reasonable physical, electronic, and managerial procedures to secure the information we collect from your mobile device or the Roborock website. We will use all reasonable efforts to safeguard your personal information.

All of your personal information will be stored on a secure server and protected in a controlled facility. We classify your data based on importance and sensitivity, and ensure that your personal information is provided with the highest level of security. We ensure that our employees and third-party service providers who access this information to help provide you with our products and services are bound by strict contractual confidentiality obligations, and that if they fail to perform these obligations, they will be disciplined or terminated. Moreover, we have implemented access controls specifically for cloud-based data storage. All in all, we will regularly review our information collection, storage, and processing practices, including physical security measures, to prevent any unauthorized access or use.

We will take all practicable steps to safeguard your personal information. However, you should be aware that the use of the internet is not entirely secure. Therefore, we cannot guarantee the security or integrity of any personal information which is transferred via the internet.

We will promptly notify the competent regulatory authority of any leakage of personal information, and in some special circumstances, we will notify the data subject of any data leakage in order to comply with applicable laws, including local data protection regulations.

What you can do
You can safeguard your personal information by not disclosing your account information to anyone, except for the person who has been duly authorized by you.

Roborock is not liable for any security breach caused by any third-party access to your personal information as a result of your failure to maintain the privacy of your personal information. Notwithstanding the foregoing, you must notify us immediately of any unauthorized use of your account or any other security vulnerabilities.

Your assistance will help us protect the privacy of your personal information.

Retention Policy
Your personal information will be retained for as long as necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws. As soon as it is reasonable to assume that any personal information is no longer necessary for the purpose for which it was collected, we will no longer retain that personal information, or will eliminate the means by which it can be associated with the specific individual. Roborock will continue to retain any data which will be further processed solely for achieving purposes in the public interest, scientific or historical research purposes, or statistical purposes, even if the further processing of such data has nothing to do with the purpose for which it was collected.

Accessing other features on your mobile device
Our App may access certain features on your mobile device, such as the Wi-Fi network status. This information is used to allow the App to run properly on your mobile device and allow you to interact with it. You can withdraw your authorization at any time by closing the App on your mobile device or by contacting us at privacy@roborock.com (or privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws).

Your rights to control your information
Roborock recognizes that privacy concerns differ from person to person. Therefore, we have provided some examples to show how you can restrict the collection, use, disclosure, or processing of your personal information and control your privacy settings.

Deleting information
You can delete all of your personal information from the App in the following way:

You can delete your cached personal information from the App by selecting "Clear Cache" in the App.

If you wish to delete your personal information stored on our server, please send us your request at privacy@roborock.com (or at privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws). After receiving your request and confirming your identity, we will delete the personal information within the specified time limit.

If you have previously agreed to us using your personal information for the above mentioned purposes, you may change your mind at any time by writing or emailing us at privacy@roborock.com (if you are a European Union user under General Data Protection Regulations or a Russian user under the Russian Federal Law on Personal Data and relevant laws, please send an e-mail to privacy@roborock-eu.com).

Accessing, updating, or correcting your personal information
You have the right to request access to and/or correction of any personal information that we hold about you. When you update your personal information, we will verify your identity before we proceed with your request. Once we have obtained sufficient information which is necessary for the processing of your request to access or correct your personal information, we will respond to your request within the period specified by applicable data protection laws.

Upon your request, we will provide a copy of your personal information collected and processed by us free of charge. If you make any additional requests for such personal information, we may charge a reasonable fee in accordance with applicable laws and based on our actual administrative costs.

If you wish to access your personal information held by us, or if you believe that any information we hold about you is incorrect or incomplete, please write to us or email us as soon as possible at privacy@roborock.com (or privacy@roborock-eu.com, if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws).

You have the right to request us to erase your personal information. We will evaluate your information erasure request. After verifying your identity, we will immediately start the deletion process and complete relevant steps including technical procedures within 15 days. You may apply for the erasure by contacting us at: privacy@roborock.com (if you are a European Union user under General Data Protection Regulations or a Russian user under the Russian Federal Law on Personal Data and relevant laws, please send an e-mail to privacy@roborock-eu.com).

If you are a European Union user under the GDPR, you have the right to request us to restrict the processing of your personal information. We will review your request for restriction. If the GDPR applies, we will process your personal information in accordance with the GDPR and will notify you

before such restriction is lifted.

If you are a European Union user under the GDPR, you have the right not to be subject to a decision based solely on automated processing, including profiling, which can produce legal effects or similar significant impacts on you.

If you are a European Union user under the GDPR, you have the right to receive your personal information in a structured, commonly used format and to transfer it to another data controller.

Withdrawing your consent
You can withdraw your consent to our Privacy Policy at any time by tapping Me > About Us > User Agreement and Privacy Policy in the App. After withdrawal of your consent, we will stop the collection of your personal information and will no longer use and/or disclose your personal information.

Please note that withdrawal of your consent will result in certain legal consequences. If you withdraw your consent to our processing of your personal information, you may be unable to use Roborock products and services.

Transferring Your Personal Information Outside of Your Jurisdiction
If we need to transfer your personal information outside of your jurisdiction, either to an affiliate or a Third-Party Service Provider, we will do so in accordance with applicable laws. In particular, we will ensure that all transfers comply with the requirements imposed by applicable local data protection laws by putting in place appropriate safeguards.

Roborock uses its own facilities and the facilities of cloud service providers worldwide to process and back up your personal information. Currently, Roborock itself has set up, or has appointed cloud service providers to set up, data centers in China, Germany, Russia, and the United States. The jurisdictions in which these global facilities are located may or may not provide data protection laws that are similar to those in your jurisdiction. We may transfer and store your personal information overseas after we have obtained your prior explicit consent and your thorough understanding of the risks associated with a lack of applicable laws and appropriate safeguards. However, this will not change any of our commitments to protecting your personal information in accordance with this Privacy Policy. If you are a European Union user under the GDPR, your personal information will be stored on the server in Germany. If you are a Russian user under the Russian Federal Law on Personal Data or applicable laws, your personal information will be stored on the server in Russia.

Miscellaneous
Minors
We consider it the responsibility of parents to supervise their children's use of our products and services. Nevertheless, it is our policy not to request personal information from minors or send any promotional materials to minors.

Roborock will not seek or attempt to seek any personal information from minors. Any parent or guardian who has reason to believe that their minor has submitted personal information to Roborock without their prior consent can contact us by email at privacy@roborock.com (or privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws) to ensure that such personal information is deleted,

and that their minor unsubscribes from any Roborock services.

Order of precedence

If you have agreed to any applicable User Agreement which is inconsistent with this Privacy Policy, this Privacy Policy shall prevail.

Updates to this Privacy Policy

We will regularly review this Privacy Policy and may update it to reflect any changes to our information practices. We will notify you of any material changes to this Privacy Policy via your mobile device so that you understand what information we collect and how we use it. Such changes to this Privacy Policy shall apply as of the effective date set out in the notice. We encourage you to regularly view this page to keep updated on our privacy practices. Your continued use of the App will be deemed as your acceptance of the updated Privacy Policy. We will once again seek your consent before we collect more personal information from you or if we wish to use or disclose your personal information for any additional purposes.

Do I Have to Agree to Any Third-Party Terms and Conditions?

Our Privacy Policy does not apply to products or services offered by any third party. The App may contain third-party products and services, as well as links to third-party websites. When you use such products or services, the corresponding third party may collect your information. For this reason, we strongly recommend that you read the third party's privacy policy, just as you have taken time to read ours. We are not responsible for the use of your personal information collected from you by any third party, nor do we have control over such use. Our Privacy Policy does not apply to other websites to which our services are linked.

Our Systematic Approach to Managing Your Personal Information under the GDPR

If you are a European Union user under the GDPR, we will adopt a systematic approach to protecting your personal information and will make full use of our personnel, management processes, and information systems to apply a risk management mechanism. According to the GDPR, Roborock will set up a Data Protection Officer (DPO) responsible for the data protection work, who can be contacted by email at dpo@roborock.com. Roborcok will also implement relevant data management processes, such as data protection impact assessment.

Contact Us

If you have any comments or questions about this Privacy Policy, or if you have any questions regarding Roborock's collection, use, or disclosure of your personal information, please contact us at the following address and reference our Privacy Policy:

Beijing Roborock Technology Co., Ltd.

Suites 6016, 6017, and 6018, 6/F, Building C, Kangjian Baosheng Plaza, No. 8 Heiquan Road, Haidian District, Beijing, P.R. China

Email address: privacy@roborock.com (or privacy@roborock-eu.com if you are a European Union user under the GDPR or a Russian user under the Russian Federal Law on Personal Data or applicable laws)

Thank you for taking the time to understand our Privacy Policy.

Third-Party SDKs

SDK Name Purpose of Using the SDK Type of Data Official Website URL

Tuya To allow you to use IoT services. Device information such as the device identifier

https://iot.tuya.com

Firebase To perform statistical analysis. Device identifier https://firebase.google.com

Sent from Outlook for Android