# Dreame Privacy Policy

Dreame Trading (Tianjin) Co., Ltd. and its affiliates (hereinafter referred to as "Dreame" or "We") respect and protect your privacy. If you use our robot vacuums ("your robot vacuum") and its supporting online application ("App" or "Dreamehome") among other related services ("products and services") and are thereby subject to Dreame Robot Vacuum Software License and Service Agreement, the Dreame Robot Vacuum Privacy Policy (hereinafter referred to as "this Policy") specifies how we collect, use, disclose, share, transfer and store the information you provide us when using our products and services and your rights.

We are fully aware of the importance of personal data to you and will do our best to protect your personal data. We are committed to maintaining your trust in us and we promise to abide by the following principles to protect your personal data: legality, legitimacy, necessity and integrity, consistency of rights and responsibilities, clear purpose, choice and consent, minimum adequacy, ensuring security, subject participation, openness and transparency among others. At the same time, we promise that we will take corresponding security protection measures to protect your personal data according to the proper security standards in your country.

Please read and understand this Policy carefully before using our products or services. Should you have any question, please contact us through any of the ways in Section VII "Contact Us" of this Policy. The privacy department and personnel will give a reply according to the time specified by law. If you are not satisfied with our reply, especially when you think how we deal with your personal data has undermined your legitimate rights and interests, you can also resort to external channels such as filing a lawsuit to the court with jurisdiction and complaining to the competent regulatory authority.

This Policy will help you understand the following contents:

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I How We Collect and Use Your Personal Data Personal data refers to all kinds of information related to identified or identifiable natural persons as recorded by electronic or other means, excluding information after anonymization.

- 1. Basic Functions That Require Collecting and Using Your Personal Data The purpose of collecting personal data is to provide you with products and/or services while we ensure that we comply with applicable relevant laws, regulations and other normative documents. Specifically, for the following occasions, you need to agree to provide the following types of information (some of which are not personally identifiable, such as cleaning logs), so that we can safely and effectively realize this basic function. Otherwise, you may not be able to enjoy the corresponding products and services.
- (1) Connect Your Robot Vacuum in Dreamehome
  In order to enable you to control your robot vacuum through your mobile
  device, you need to connect your Dreamehome account, mobile device and
  your robot vacuum to your Wi-Fi network, so as to connect your robot vacuum
  in Dreamehome. In this process, we will collect your: (1) Dreamehome account
  information; (2) mobile device information, including device model, unique
  identification code (only used to protect your safe use of networks and
  services), NIC (Mac) address, operating system and its version; (3) information
  about your sweeping robot, including equipment model, SN code and NIC
  (MAC) address; (4) Wi-Fi network information, including the name of the
  current Wi-Fi network, the mode of Wi-Fi (LAN mode, remote mode), IP
  address, the signal strength indicator of the Wi-Fi (i.e. RSSI), as well as the
  Wi-Fi name (SSID) and Wi-Fi password you provide.

# (2) Perform Cleaning Tasks

In order to perform the cleaning tasks according to your needs, we will collect maps of your cleaning environment and cleaning routes so that you can partition your area and set the cleaning zones and the cleaning sequence; we collect information about time as displayed on your device and time zone to perform/not to perform the cleaning task at a specific time; obstacle avoidance sensors or other hardware used by some types of robot vacuums may lead to the collection of information about the features of obstacles and rooms to guide the device to avoid obstacles. The obstacle avoidance information collected locally by the device will only be processed in the device memory and

will not be uploaded to the server.

# (3) Reminders of Abnormal Operation

In order to help you better eliminate the fault of the robot vacuum, when your device runs abnormally, we will collect the operational log, status data and behavioral data (including the records of each function when it is on and off and the corresponding status), fault and firmware upgrade.

# (4) Display device information

In order to help you better understand the status of your device, we will collect your device information, such as device setting information, device consumables information, and device cleaning record information, so that you can view it on the App at any time.

# 2. Additional Features That Require the Collection and Use of Your Personal Data

In order to enable you to better enjoy more functions provided by our robot vacuum and improve your user experience, some of our products support one or more of the following additional functions (please understand whether your robot vacuum has the following additional functions according to the product manual). We may collect and use your personal data when you use the following additional features. If you do not provide these personal data, you can still use the aforementioned basic functions, but you may not be able to use additional functions that can bring you more optimized services. These additional features include:

## (1) User Feedback

You can feed back problems you encounter in the process of usage through User Feedback. In order to help you better solve the problems, we will collect your issue log, contact information and feedback provided by you.

#### (2) Device Sharing

When you use Device Sharing to share the robot vacuum with your friends, we will collect information about your friend's Dreamehome account and your robot vacuum. We remind you that when you use the "Device Sharing" function, users you are sharing with can also view your device information at any time in their interface.

## (3) Al-enabled Intelligent Recognition

When you turn on the function of AI intelligent recognition, your robot vacuum will take photos of obstacles in the room, identify the types of obstacles according to their characteristics, determine the type of your room (such as kitchen, living room, bedroom, etc.) and more accurately identify pet feces (you need to set the environment as Pet). The photos of the said obstacles will not

be stored locally or uploaded to the server. After the machine recognizes the types of obstacles, the photos will be deleted automatically. You can turn this function on or off at any time. If you turn this function off, your robot vacuum can still use basic obstacle avoidance technology to avoid obstacles.

- (4) Real-time Camera When you turn on the function of Real-time Camera, we will provide you with the following services:
- (1) You can manually select any modes of "Remote Control", "Mark to Go", "Whole-House Cruise" and "Human Following" to realize real-time monitoring of the situation inside the house and command your vacuum to livestream or take pictures of the situation inside the house.
- (2) You can realize voice transmission between mobile phone and the device through the voice button.
- (3) You can view and download the photos taken by your robot vacuum in the "Photos" at any time.

Please be noted that if you place your robot vacuum in your or other personnel's private space, or choose to run it there, the videos, photos or radar remote sensing data generated after the above functions are activated may still contain personal data such as your or other personnel's privacy, portrait or facial recognition information. When you use voice transmission, the voice messages or audios as generated may include your or other people's personal data. It is suggested that you or others should not mention personal data such as ID number, name, phone number, account password, etc.

Only after you opt to turn on this function, the real-time camera function will start to run and you can turn it off at any time. After turning it off, this function will stop running. The videos generated by using this function will be sent to your app account and presented in the form of live streaming or photos. In order to realize real-time camera function, we need you to enable the camera permission of the robot vacuum in your App. When you use "Human Following", your robot vacuum will recognize and follow the character model through algorithms. During this process, your robot vacuum will not recognize character features or take any photos. If you need to use the voice transmission function, you also need to enable the microphone permission of your mobile device. If you need to download photos locally, we need to access your Photos permission to store photos, but we won't read your Photos. If you refuse to enable relevant permissions or do not allow us to collect these information, we will not be able to provide you with video monitoring services, but it will not affect your normal use of the basic functions of the robot vacuum.

In order to ensure the security of your personal data to the greatest extent, you need to set the startup code when you use the real-time camera function for the first time, and input the said code when you use the function later to ensure the security of your personal data. The video captured by your robot vacuum will be shown to you on the App in the form of media stream through local server in an encrypted environment. In this process, we will not collect or store any of your video information. Your photos will be stored on our local cloud server. You can view, download or delete your photos at any time in the "Photos". When you choose deletion, we will delete it on the server in time. If you use our voice transmission function, we will encode your voice information. The encoded content will be encrypted and transmitted through our local server. After decoding, it will be played. In this process, we will not collect or store any of your voice information.

For more information about this function, you can refer to the product function manual or the separate privacy protection instructions of this function.

## (5) Pictures

When you turn on this function, your robot vacuum will take pictures of the identified obstacles, and the pictures may cover the surrounding environment of the identified obstacles. Therefore, we remind you that if you place your robot vacuum in your or other person's private space, or choose to run it in your or other person's private time, the pictures taken may contain personal information, such as your or others' privacy, portrait or facial recognition information.

In order to maximize the security of your personal information, we have adopted strict protective measures. In order to show you the obstacle photos through App, the photos taken will be transmitted to your mobile device through the server in encrypted form, and the photos on the server will be automatically deleted within reasonable period. Therefore, we do not obtain your photo information.

However, when you use the feedback function to report an obstacle identification error, the reported photo will be uploaded to the server, and we will obtain the photo to analyze the reason for the identification error. Therefore, before you use the feedback function, please consider carefully and ensure that your photo do not contain any personal information that you do not want to share with others.

At the same time, we fully respect your personal information rights. You can turn off this function at any time through "Settings" - "Al Recognition" - "Pictures". You can choose to exercise the right to delete any obstacle pictures

taken by this function. If you do not actively delete the obstacle pictures, when you perform a new cleaning task, the pictures that you took during your last cleaning task are automatically deleted.

# (6) Voice Assistant

When you turn on the voice assistant, your robot vacuum will obtain your voice information and convert it into an instruction code through a third-party service provider, and your robot vacuum will perform corresponding tasks according to the instruction code. Please note that using this feature requires your microphone permission. You can turn off this function at any time via "Settings" – "Voice Assistant".

3. We Obtain Your Personal Data from a Third Party Where permitted by laws, we may obtain your personal data from a third party.

If the personal data processing activities we need to carry out for our business development exceed the scope of your original authorization and consent when you provide personal data to third-party service providers, we will obtain your express consent before processing your personal data. In addition, we will strictly abide by relevant laws and regulations, and require third-party service providers to ensure the legitimacy of the information they provide.

## 4. Non-personal Data We Collect

We may also collect other information that cannot directly or indirectly identify specific individuals and is not personal data under locally-applicable laws. Such information is called non-personal data. For example, the statistical data generated when you use a specific service, such as the user's operational behavior (including click, page jumps and browsing time). The purpose of collecting the said information is to improve the services we provide to you. The type and amount of information as collected depends on how you use our products and/or services. We will summarize such information to help us provide customers with more useful information and understand which parts of our website, products and services customers are most interested in. Concerning this Policy, aggregated data is considered non-personal data. If we combine non-personal data with personal data for usage, then such information will be regarded as personal data.

Il How We Conduct the Entrusted Processing, Sharing, Transferring and Public Disclosure of Your Personal data

## 1. Entrusted Processing

Dreame may entrust other companies to process your personal data on our behalf. We promise you that when we entrust third-party companies to process the said information, we will comply with the following requirements:

- 1. The analysis we entrust them to do shall not exceed the scope of authorization and consent we have obtained from you, unless your consent is not mandatory;
- 2. We evaluate the data security capabilities of the entrusted party in advance to ensure that it has the said capabilities as required by local laws and regulations;
- 3. We specify the responsibilities and obligations facing the entrusted party through the contract, make it comply with the provisions of locally applicable laws, and require it to discharge the obligations without falling short of our standards;
- 4. We accurately record and save the personal data as entrusted, so as to ensure your information security and effective access and control of your personal data;
- 5. When the entrustment relationship is terminated, or when we delete or anonymize your personal data according to this Policy, we will require the entrusted party to delete your personal data and destroy all data copies.

## 2. Sharing

Generally, we will not share your personal data, except for the following cases:

- 1. After obtaining your express consent, Dreame will share the information within your authorization with the third party designated by you; specifically, we share the home environment map, house features and device information you have provided to us to your relatives and friends at your request, so as to help them quickly use the software and services through their terminal devices.
- 2. Part of what constitute our products and services are provided by third-party service providers, for whom we need to provide some of your personal data, such as IT services, customer support services, e-mail sending services and other similar services, so as to ensure that they can provide services for us. Some data sharing with third parties will be carried out through Application Programming Interface (API) and Software Development Kit (SDK). SDKs of different third parties will be different, and they generally include third-party account login, sharing, third-party payment, manufacturers' push, statistics, etc. We will conduct strict security testing on the third party and impose data protection measures. Before you enter the third-party page for the first time, the third-party service provider will show you the relevant agreements and privacy statements. Please read these agreements and privacy statements carefully.

If we share your personal data with these third parties, we will rely on encryption and other means to ensure your information security. For companies and organizations with which we share personal data, we will reasonably review their data security environment, sign strict data processing agreements with them, require the said third parties to take adequate protection measures for your information, and strictly comply with relevant laws, regulations and regulatory requirements.

- 3. We disclose your personal data to subsidiaries or other third parties in the event of reorganization, merger, sale, entering into partnership, assignment, transfer or other disposal of all or part of our business, assets or shares (including but not limited to bankruptcy or any similar proceedings as described). In this case, you will receive explicit notification of changes in ownership, incompatibility of new ways of using personal data and selection of personal data via email and/or our website.
- 4. When we deem it necessary or appropriate, we shall: (a) comply with locally applicable laws and regulations; (b) comply with legal procedures; (c) respond to requests from public institutions and government authorities, including those outside your country of residence; (d) fulfill our terms and conditions; (e) protect our operations, businesses and systems; (f) protect the rights, privacy, security or property of ours and/or other users, including you; and (g) seek available remedies or limit the damages we may be required to provide.
- 5. We disclose your personal data to Dreame's subsidiaries or affiliates to carry out business activities on a regular basis.

## 3. Transferring

Transferring means that we lose control over your personal data and the transferee obtains control over your personal data. In principle, we will not transfer your personal data to any company, organization or individual. Should it be necessary to do so, we will transfer it in accordance with applicable laws, and inform you of the purpose of the transferring, the personal data involved, the transferee, etc.

Information transfer may occur under the following circumstances:

- 1. Transfer based on your express consent: after obtaining your express consent, we will transfer your personal data to other parties.
- 2. In case of merger, acquisition or bankruptcy liquidation, should personal data transferring be involved, we will require the new company or organization holding your personal data to continue to be bound by this statement.

  Otherwise, we will require the said company or organization to ask you for

authorization and consent again.

#### 4. Public Disclosure

In principle, we will not publicly disclose your personal data. Should public disclosure be really necessary, we will inform you in advance of the purpose of this public disclosure, the type of information disclosed and the content of personal sensitive information that may be involved, obtain your express consent and perform relevant obligations in accordance with locally applicable laws.

We will only publicly disclose your personal data under the following circumstances:

- 1. After your express consent is obtained.
- 2. Legal disclosure: we may publicly disclose your personal data in compliance with local laws, legal procedures, litigation or mandatory requirements of government authorities.
- 5. Information that does not require consent

We may share anonymous information with third parties (such as advertisers on our website) in the form of aggregation for commercial purposes; we may share with them general usage trends of our services, such as the number of customers in a specific group who buy certain products or engage in certain transactions.

To dispel doubt, we may collect, use or disclose your personal data without your consent as expressly permitted by local data protection laws (e.g. to comply with subpoenas). Besides, we may disclose your information without your consent when we may believe in good faith it is necessary to do so with a view to protecting our rights, protecting your safety or the safety of others, conducting fraud investigations or responding to government requests.

III How We Store and Protect Your Personal Data

1. Where We Store Your Personal Data

Currently, Dreame runs data centers in the United States, Germany, and Singapore. Your personal data is stored in the server according to the region you live. If you are Europe Union user under General Data Protection Regulation (hereinafter referred to as "GDPR"), your personal data will be stored in the German server.

## 2. Storage Period

We retain personal data for a period for the sake of information collection described in this Policy, or we do so in compliance with locally applicable

relevant legal requirements. After fulfilling the purpose of personal data collection, or after we confirm your application of deletion or cancellation, or after we terminate the operation of corresponding products or services, we will stop retaining personal data and delete or anonymize it. If it is for the purpose of public interest, scientific, historical research or statistics, we will continue to retain relevant data based on applicable laws, even if further data processing is irrelevant to the original purpose.

#### 3. Protection Measures

We promise to ensure the security of your personal data. In order to prevent unauthorized access, disclosure or other similar risks, we have implemented reasonable physical, electronic and management measures and processes to protect the information we collect from your products and Dreame website. We will take all reasonable measures to protect your personal data.

We classify your data according to importance and sensitivity, and ensure that your personal data is protected at the highest security level. We guarantee that employees and third-party service providers who provide products and services to you by accessing these information have strict contractual confidentiality obligations. If they fail to fulfill these obligations, they will be subject to disciplinary punishment or termination of cooperation. All in all, we regularly review information collection, storage and processing practices, including physical security measures, to prevent any unauthorized access and use.

We will take all feasible measures to protect your personal data. However, you should be aware that the use of the Internet is not always safe. Therefore, we cannot guarantee the security or integrity of any personal data during two-way transmission through the Internet..

#### **IV Your Rights**

According to the applicable laws and regulations of your country or region, you are entitled to relevant rights on any of your personal data (hereinafter referred to as "the Request") held by us. Most laws require that requests made by individuals should comply with specific requirements, and this Policy requires that your request should meet the following circumstances:

- 1. Through our special request channel, and for the sake of protecting your information security, your request should be in writing (unless oral application is explicitly recognized by local laws).
- 2. You should provide sufficient information so that we can verify your identity and ensure that the requester is the subject or a legally authorized person of the requested information.

We have the right to refuse to deal with meaningless/repeated requests, requests for unreasonable technical work, requests that violate the privacy of others, extremely unrealistic requests and requests that do not need to be granted under local law. We may also refuse your request if we believe that some aspects of your request may prevent us from legally using the data for the above-mentioned anti-fraud and security purposes.

Once we have sufficient information to confirm that we can process your request, we will respond to your request within the time specified by applicable data protection laws.

Specifically, you can contact us via <a href="mailto:privacy@dreame.tech">privacy@dreame.tech</a> or exercise the following rights on the Dreamehome:

# 1. Accessing Your Personal data

Concerning personal data that we have collected and processed, you can gain the access on the Dreamehome or contact us via <a href="mailto:privacy@dreame.tech">privacy@dreame.tech</a> for the access.

# 2. Copying Your Personal data

Based on your requirements and locally applicable laws and regulations, we can provide a record of your personal data we have collected and processed for free. If you make other requests for relevant information, we may charge you a reasonable fee based on relevant applicable laws and the actual management cost.

# 3. Correcting Your Personal data

If you believe that any information we hold about you is incorrect or incomplete, you may request correction or addition of personal data for use.

## 4. Erasing Your Personal data

You can delete your personal data in the following ways:

- 1. Delete information about your cleaning environment map and cleaning records among others on Dreamehome.
- 2. The personal data generated by some functions can be deleted by specific methods. For example, the video monitoring function enables you to delete the personal data generated by using this function by resetting the startup code. For specific deletion methods of each function, please refer to the function privacy protection instructions or relevant product manuals.
- 3. Click "My" "Account Settings" "Delete Account" on Dreamehome to log off the Dreamehome account. Canceling your account will delete all personal

data as generated during your use of our products. Please be noted that logging off the Dreamehome account will delete all information as generated during your use of the app.

4. Through the device of the robot vacuum, you can reset the it to the Factory Default Settings through the reset button. For the specific method, please refer to the relevant product instructions.

According to your locally applicable laws and regulations, you may have the right to ask us to delete your personal data. We will make evaluation according to your request. If the corresponding provisions are met, we will take corresponding steps, including technical means, to deal with it. When you have deleted relevant information or have done so with our assistance, due to applicable laws and security technologies, we may not be able to delete the corresponding information from the backup system immediately. We will safely store your personal data and exempt it from any further processing until the backup can be cleared or anonymization is realized.

#### 5. Withdrawal of Consent

You may withdraw your consent by submitting a request, including the collection, use and/or disclosure of your personal data in our possession or under our control. Depending on the specific service you use, you can withdraw your consent directly via Dreamehome or contact us for relevant operations. We will process your request within a reasonable time after you make your request, and will no longer collect, use and/or disclose your personal data thereafter.

Please be noted that according to the scope of information you authorize us to process, your withdrawal of consent may result in you not being able to enjoy some services of Dreamehome or your robot vacuum. However, your decision to withdraw your consent or authorization will not affect the previous personal data processing based on your authorization. You can click "Settings" – "More Settings" – "Legal Information" – "Revoke Authorization" in the App to request withdrawal of consent.

## 6. Rights under GDPR

If you are Europe Union user under GDPR, you can exercise the following rights:

- 1. The right to obtain from us the erasure of your personal information. We shall consider the grounds regarding your erasure request and take reasonable steps, including technical measures, if the grounds apply to GDPR.
- 2. The right to obtain from us the restriction of processing your personal

information. We shall consider the grounds regarding your restriction request. If the grounds apply to GDPR, we shall only process your personal information under applicable circumstances in GDPR and inform you before the restriction of processing is lifted.

- 3. The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- 4. The right to receive your personal information in a structured, commonly used format and transmit the information to another data controller.

If you are Europe Union user under GDPR, Dreame will provide systematic approach to manage personal data deeply engages our people, management processes and information systems by applying a risk management methodology. According to the GDPR, for instance, (1)Dreame set up a Data Protection Officer (DPO) in charge the data protection, and the contact of DPO is <a href="mailto:dpo.sg@dreame.tech">dpo.sg@dreame.tech</a>; (2)Dreame Information designate a representative in Europe, and the contact of representative is <a href="mailto:representative.dreame@herrero.es">representative.dreame@herrero.es</a>; (3)procedure like data protection impact assessment (DPIA).

# 7. Rights under CCPA

If you are a California resident and the California Consumer Privacy Act of 2018 (hereinafter referred to as "CCPA") does not recognize an exemption that applies to you or your Personal Information, you have the right to:

- 1. Request we disclose to you free of charge the following information covering the 12 months preceding your request:
- (1) the categories of Personal Information about you that we collected;
- (2) the categories of sources from which the Personal Information was collected;
- (3) the purpose for collecting Personal Information about you;
- (4) the categories of third parties to whom we disclosed Personal Information about you and the categories of Personal Information that was disclosed (if applicable) and the purpose for disclosing the Personal Information about you; and
- (5) the specific pieces of Personal Information we collected about you;
- 2. Request we delete Personal Information we collected from you, unless CCPA

recognizes an exemption; and

- 3. Be free from unlawful discrimination for exercising your rights including providing a different level or quality of services or deny goods or services to you when you exercise your rights under the CCPA.
- 4. Have the right to opt out of certain uses and disclosures of your personal information. Where you have consented to Dreame's processing of your personal information, you may withdraw that consent at any time and opt—out to further processing by contacting Dreame. In order to provide our services to you, we will ask you to provide personal information that is necessary to provide those services to you. If you do not provide your personal information, we may not be able to provide you with our products or services. Even if you opt—out, we may still collect and use non—personal information regarding your use of our products.

We aim to fulfill all verified requests within 45 days pursuant to the CCPA. If necessary, extensions for an additional 45 days will be accompanied by an explanation for the delay.

#### **V** Minors

We believe that it is the responsibility of parents to supervise children's use of our products and services. However, our policy does not require access to personal data of minors and we do not send any promotional materials to such groups.

Dreame will not seek or attempt to receive any personal data from minors. If parents or guardians have reason to believe that minors have submitted personal data to Dreame without their prior consent, please contact us to ensure that such personal data is deleted and that minors cancel their subscription to any applicable Dreame services.

#### VI Transfer of Personal Data between Countries

To the extent that we may need to transfer personal information outside of your jurisdiction, whether to our affiliated companies (which are in the communications, social media, information technology, and cloud businesses) or Third Party Service Providers, we shall do so in accordance with the applicable laws. In particular, we will ensure that all transfers will be in accordance with requirements under your applicable local data protection laws by putting in place appropriate safeguards. You will have the right to be informed of the appropriate safeguards taken by Dreame for this transfer of your personal information.

VII Contact Us

If you have any comments or questions about this Policy, or if you have any questions about our collection, use or disclosure of your personal data, please contact us at the address below and mention the "Privacy Policy". We have a professional team to solve your problems when you have any issue concerning your rights and questions related to personal data. If your question itself involves more important matters, we may ask you for more information. If you are not satisfied with the response you have received, you can refer the complaint to the relevant regulatory authority of the jurisdiction. If you consult us, we will provide information on possible applicable complaint channels according to your actual situation.

E-mail address: <u>privacy@dreame.tech</u>

Tel.: +86-400-875-9511

Website: <a href="https://global.dreametech.com">https://global.dreametech.com</a>

VIII Update of This Privacy Policy

We will regularly review this Policy and may update it to reflect changes in our information practices. If we make significant changes to this privacy policy, we will notify you by email (to the email address specified in your account) or on all search websites or through mobile devices, so that you can understand the information we collect and how we use it. Such policy changes will apply from the effective date specified in the notice or on the website. We recommend that you check this page regularly for the latest information on our privacy practices. If you continue to use products and websites or other services, you will be deemed to accept the updated privacy policy. When we collect more personal data from you or we hope to use or disclose your personal data for new purposes, we will obtain your consent again.

This Policy takes effect from the date of updating.

Last updated: June 21, 2023

Sent from Outlook for Android