

PROMOBOT LLC

PROCESSOR' S PRIVACY STATEMENT

This is the privacy statement of Promobot LLC, a company having its address in Perm, Russia. Promobot LLC is a legal entity incorporated under the laws of the Russian Federation under the primary state registration number 1155958016411 ("Promobot").

We, at Promobot, have developed a robot comprising of the set of hardware and software which enables an individual to receive certain services from a service provider ("Robot"). We develop and/or purchase software and hardware, combine them into Robot but we do not provide services to EU/EEA customers directly. We only produce Robots and sell them either to service providers directly or to one of our EU/EEA-based dealers which in turn sell them to service providers. In very limited cases we may lease Robots, but this happens (if happens) rarely.

PLEASE READ THIS STATEMENT ATTENTIVELY

1. WHAT DO WE DO FOR YOUR SERVICE PROVIDER AND HOW TO CONTACT US

IN SHORT: We do not use your personal data for any purpose other than for serving your service provider. We are the processor of your personal data under the General Data Protection Regulation. If any questions, contact us at Shosse Kosmonavtov, 111 building 2, Perm, 614066, Russia, +7(342)2578085.

We grant service providers access to the full functionality of Robots, customize Robots to the specific needs of service providers, provide a software upgrade, service, technical support, warranty, and post-warranty support. We, therefore, process personal data when we provide services to your service provider.

Your service provider establishes its own purposes and essential means of processing your personal data. Taking this into account we are entering into a data processing agreement and, broadly speaking, are bounded by your service provider's detailed instructions. We are therefore the so-called processor, and we act on behalf of your service provider.

Please refer to your service provider's privacy policy (or similar document) because it should contain important information regarding your personal data.

We do not use your personal data for any other purpose including in case we improve our Robots and/or their hardware or software.

We process personal data of EU/EEA data subjects under the General Data Protection Regulation (the "GDPR"), the GDPR-based legislation, and the other applicable privacy legislation as well as under your service provider instructions.

If you are under 16 years old, you should immediately stop using our Robots.

You may contact Promobot using the following contact details:

Shosse Kosmonavtov, 111 building 2, Perm, 614066, Russia,

+7(342)2578085

Senior lawyer Angelina Lesenchuk, a.lesenchuk@promo-bot.ru

2. WHAT INFORMATION DO WE PROCESS

IN SHORT: We process personal data that you provided to your service provider when you communicate with the Robot and/or when you consume services from your service provider. We, as the processor, may have access to data that is stored in Robot's memory or to your data transferred to our servers from the Robot.

We have access to personal data that you have provided to your service provider to the extent it decided to permit us to access this information. Your data may be initially stored in Robot's memory with us having access to it or your data may be directly transferred to our servers from the Robot. Thus, we do not collect any of your personal data from sources other than from (and/or under instructions of) your service provider.

The scope of personal data that we receive depends on the actual facts and circumstances, in particular, on the type of Robot, how the Robots are being used, Robots' actual location, how you communicate with Robots, privacy settings established by your service provider, etc. You may (or may not) be obliged to provide this data to it. Please check the service provider's privacy policy (or similar document) for details.

We do not use your personal data for any other purpose including in case we improve our Robots and/or their hardware or software. You, however, may additionally notify us if you wish to restrict us from using your data for the improvement of our Robots.

3. WHY DO WE PROCESS YOUR PERSONAL DATA

IN SHORT: We need your data to serve your service provider's Robots that we supplied to it.

We have supplied our Robots to your service provider. Obviously, the Robots permanently require a software upgrade, service, technical, warranty, and post-warranty support. Sometimes, there may be technical failures, mistakes, and bugs that must be promptly settled and fixed. We do all (or some) of the above for your service provider and for this purpose we, under your service provider's instructions and permissions, receive your personal data.

4. WILL WE SHARE YOUR INFORMATION WITH ANYONE

IN SHORT: We do not share your information.

No, we do not share your information other than under instructions from your service provider. We also do not share your personal data that we receive from one service provider with another service provider.

5. FOR HOW LONG DO WE STORE PERSONAL DATA

IN SHORT: We keep your data to the extent your service provider allows us to do it.

Your personal data will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations.

We will permanently delete or de-identify your personal data once your service provider specifically asks us to delete it. We may be unable to fully delete or de-identify your information due to technical or other operational reasons (for example where information has been archived and stored in backup systems). Where this is the case, we will take reasonable measures to securely isolate information from any further processing and store it until we can delete or de-identify it.

If you wish any of your personal data to be deleted, please, contact your service provider. In many cases, we will need to act under its instructions.

6.WHAT RIGHTS DO YOU HAVE

IN SHORT: You have certain rights concerning your personal data.

You have a variety of rights granted to you under the GDPR. Please refer to your service provider's privacy policy (or similar document) for greater details regarding your rights. Should you wish to use any of your rights, please contact your service provider.

7. DO WE PROCESS YOUR PERSONAL DATA OUTSIDE EU/EEA

IN SHORT: We store your personal data in Germany and Russia and process it in Russia.

We store and process your personal data on servers located in Germany and Russia. If we need to replace our German server, we will find another location in the EU/EEA to continue storing your personal data in the EU/EEA.

Since Promobot is a Russian company, we will process your personal data in Russia. We are committed to ensuring an adequate level of protection for your rights and freedoms.

As noted above, we are a processor with respect to your personal data acting on behalf of your service provider. Please refer to your service provider's privacy policy (or similar document) for more details.

8. WILL WE CHANGE THIS PRIVACY STATEMENT

IN SHORT: We will. We will keep an updated version of our privacy statement on our webpage <https://promo-bot.ai/> so you can always read it.

We will continually review our privacy statement to ensure that it accurately reflects the GDPR, our processing activities, and our status of processor acting under the instructions of your service provider.

We reserve the right to make changes or updates at any time. We will notify you of any changes by posting the new privacy statement on our web page. In case of material amendments, we will also prepare a high-level outline of the amendments introduced.

We recommend you to review this privacy statement periodically. Amendments to this privacy statement are effective only when they are posted on the link that we mentioned above.
