

SBRUK PRIVACY POLICY

SoftBank Robotics (UK) Ltd

Effective as of 12th March 2024

ICO certificate reference number: ZA750215

This section of the Website is owned and operated by **SoftBank Robotics (UK) Limited**, Reg No12222041, whose registered office is 30 Old Bailey, London EC4M 7AU, UK (“SBRUK”, “We”, “Us”, “Our”) its group companies and its subcontractors. SBRUK collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and we are responsible as ‘Data Controller’ of that personal information for the purpose of those laws.

SBRUK respects your privacy and is committed to protecting your personal information.

This privacy statement describes how SBRUK collects and uses personal information we collect when you visit our website (<https://emea.softbankrobotics.com>), use the products and services owned and operated by SBRUK or otherwise interact with us online. This privacy statement describes the options available to you regarding our use of your personal information and how you can access and modify this information.

The term “personal information” as used in this privacy statement shall mean any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, business name, identification number, location data, online identifier or one or more factors specific to you. If you have questions or complaints regarding our privacy statement or practices, please contact us our DPO, Jane Haywood jane.haywood@softbankrobotics.com or uk-privacy@softbankrobotics.com.

Collection of Personal Information

We collect personal information in the following ways:

Personal information you provide to us

You may provide your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise in your capacity as an employee or owner of a business. You may also provide personal information when you inquire about our Services, products, subscribe to publications, request marketing materials or communications to be sent to you and when you register for and/or attend an event (e.g. an SBRUK sponsored or hosted event or a third-party event where SBRUK exhibits). we also collect personal information, when you contact us (online or offline)

in connection with a request for information about any products or to provide you with support, we collect personal information necessary to fulfil your request, to grant you access to the information, to provide you with support, and to be able to contact you.

Personal information from automated technology

As is true of most websites, we automatically gather technical information about your device when you visit our website or access associated portals via cookies, server logs, beacons and other similar technologies. Please see our cookie policy at <https://emea.softbankrobotics.com/cookies-policy> for further details on the cookies we use.

We may combine this automatically collected technical information with other personal information we collect about you. We do this to improve marketing and analytics.

Personal information collected from third parties or public sources

We will receive personal information about you from third parties as set out below:

- Analytics and marketing providers are Google Analytics where we collect website usage data and technical data such as your IP address and geolocation.

Types of personal information collected

The Types of personal information we collect are as follows:

- Email Address
- First Name
- Last Name
- Phone Number
- Your place of work
- Occupation/Job Title
- Technical data such as IP Addresses, browser type, log data, internet service provider, referring/exit pages, operating system and general geo location (we do not collect precise geo location).
- Device identifiers such as system and performance information when you download and use associated portals
- Billing/payment transaction data
- Information voluntarily provided, including but not limited to: survey information, marketing data, usernames, passwords, feedback and any other information submitted during the course of normal correspondence with SBRUK or its third-party partners.

- Website usage data (how you interact with our website, products and services)
- Any personal information within any email communication we have with you.

Special categories of data are not collected nor processed by SBRUK.

Use of Personal Information and Legal Basis

We collect and process personal information about you only where we have a legal basis for doing so under applicable data protection law, including under the UK GDPR. The legal basis will depend on the purpose for which we process your personal information. This means we collect and use your personal information only where:

- The collection and use satisfy a legitimate interest (which are not overridden by your rights and interests);
- You give us consent to do so for a specific purpose on registration or otherwise; or
- We need to process your personal information to comply with a legal obligation.

If you have consented to our use of your personal information for a specific purpose, you have the right to change your mind at any time. Where we are using your personal information because we or our customer have a legitimate interest to do so, you have the right to object to that use; however, in some cases, your objection may result in your inability to use some or all features and functionality of the portal.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal information for an unrelated purpose, we will notify you to gain your consent to continue processing your personal information in these circumstances or explain the legal basis which allows us to do so (for example, due to a legal obligation).

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your information. Please

contact us if you need details about the specific legal ground, we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose / Activity	Lawful basis for processing, including basis of legitimate interest.
Provide, maintain, improve, and protect our website and portals.	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
Develop new products and services.	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
Confirm your identity, verify accounts and activity.	Necessary for our legitimate interests (to carry out on-boarding activities)
Monitor suspicious or fraudulent activity and to identify violations of our terms.	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
Provide more tailored services to you and send you requested product or service information.	Necessary for our legitimate interests (to develop our services and grow our business)
Send you a newsletter and/or marketing email. We may also use the information you provide to contact our corporate customers for marketing purposes if they elect to continue to receive such communications.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website and platforms updated and relevant, to develop our business and to inform our marketing strategy)

We may use your email address to send you newsletter or marketing emails. We will ask for your consent in line with the applicable law when you first provide your personal information. Also, you can opt out by following the unsubscribe instructions included in those emails, or you can contact us at uk_privacy@softbankrobotics.com.

If you are a customer of one of our customers and would no longer like to be contacted by one of our customers that use our service, please contact the customer with whom you interact directly.

Information Sharing

We will share your personal information with third parties only in the ways that are described in this privacy statement.

We may provide your personal information to third parties who are acting on our behalf or assist us in providing services to you, such as data storage, maintenance services, hosting services, database management, web analytics, telecommunication, to meet any legal requirement and payment processing providers. We do not allow these third parties to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Such third parties are subject to this privacy statement in addition to certain contractual obligations with respect to the use of your personal information. Notwithstanding such legal and contractual obligations between SBRUK and such third parties, SBRUK remains potentially liable for any misuse of personal information by such third parties.

We may also disclose your personal information:

- as required by law;
- as is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request, in response to lawful requests by public authorities, including to meet national security or law enforcement requirement;
- if one of the SBRUK affiliates or group companies is involved in a merger, acquisition or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information; and
- to any other third-party with your prior consent to do so (e.g. for third party marketing purposes).

International Transfers

We may share your personal information within the Softbank Robotics Group. This will involve transferring your information outside the UK.

Many of the external third parties that we may share your personal information with are based outside the UK so their processing of your personal information may involve a transfer of information outside the UK.

Whenever we transfer your personal information out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal information to countries that have been deemed by the UK to provide an adequate level of protection for personal information. For further details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/>.
- We may use specific contracts approved for use in the UK which give personal information the same protection it has in the UK, namely the International Data Transfer Addendum to the European Commission's standard contractual clauses for international data transfers. For further details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/>.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the UK.

Cookies and Other Tracking Technologies

For more information about the cookies, we use and how to change your cookie preferences, please see our cookie policy at <https://emea.softbankrobotics.com/cookies-policy>.

Links to Other Websites

Our website includes links to other websites whose privacy practices may differ from those of SBRUK. If you submit personal information to any of those sites, your information is governed by their privacy statements. We encourage you to carefully read the privacy statement of any website you visit.

Our website may include Social Media Features, such as the Facebook Like button, LinkedIn and Widgets, the Share this button, or interactive mini programs that run on our website. These features may collect personal information, including your IP address and which page you are visiting on our website, and will set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted

by a third-party or hosted directly on our website. Your interactions with these features are governed by the privacy statement of the company providing it.

Security

The security of your personal information is important to us. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Sensitive information, such as username and password used during log-in, is transmitted over the Internet by using Secure Socket Layer (SSL) / Transport Layer Security (TLS) encryption.

However, no method of transmission over the Internet and no method of electronic storage are 100% secure. Therefore, while best efforts are made to secure your information, we cannot guarantee absolute security.

If you have any questions about security on our website or associated portals, you can contact us at uk-privacy@softbankrobotics.com.

Information you provide to us

If your personal information changes or you no longer desire our service, in certain circumstances you may correct, update, amend, delete, remove, or deactivate it by making the change within your specific application instance, by emailing our customer support at uk-privacy@softbankrobotics.com, or by contacting us by postal mail at the contact information listed below. We will respond to your request without undue delay and within one month of receipt of your request. Further information on this can be found in the '*your legal rights*' section below.

Data Retention

We will retain your information for as long as your account is active or as needed to provide you services. If you discontinue engagement with SBRUK content, your personal information may be stored for one year after the last engagement with the company. After which time, it will be archived. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Your legal rights

As stated above, in certain circumstances, you have rights under the UK GDPR in relation to your personal information. If you wish to exercise any of the rights set out below, please contact us at uk-privacy@softbankrobotics.com.

- **Request access to your personal information:** You may have the right to request access to any personal information we hold about you as well as related information, including the purposes for processing the personal information, the recipients or categories of recipients with whom the personal information has been shared, where possible, the period for which the personal information will be stored, the source of the personal information, and the existence of any automated decision making.
- **Request correction of your personal information:** You may have the right to obtain without undue delay the rectification of any inaccurate personal information we hold about you. SBR may need to verify any new information provided by you before correcting it.
- **Request erasure of your personal information:** You may have the right to request that personal information held about you is deleted. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal information:** You may be able to object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing your personal information:** You may have the right to restrict processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:
 - If you want us to establish the information's accuracy.
 - Where our use of the information is unlawful, but you do not want us to erase it.
 - Where you need us to hold the information even if we no longer require it, as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your information, but we need to verify whether we have overriding legitimate grounds to use it.
- **Withdraw Consent:** You have the right to withdraw consent at any time where we are relying on consent to process your personal information. However, this

will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **Request transfer of your personal information:** You may have the right to request transfer of personal information directly to a third party where this is technically feasible. Where you believe that we have not complied with our obligation under this privacy statement or relevant data protection laws, you have the right to make a complaint to the UK Information Commissioner's Office (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Extension to Response Time

The one-month period referred to above may be extended further where necessary, taking into account the complexity and number of requests from the individual. We shall inform you, where possible, within one month of receipt of the request, together with the reasons for the delay.

Notification of Privacy Policy Changes

We may update this privacy policy from time to time to reflect changes to our information practices. When we do, we will also revise the "effective date" at the beginning of the privacy policy. If we make any material changes, we will notify you one of the following means: posting a notice on this website or emailing you (sent to the e-mail address specified in your account, if applicable). We encourage you to review this privacy policy periodically to stay informed on our privacy practices.