

# Roboworks Privacy Policy

Roboworks's Privacy Policy describes how Roboworks collects, uses, and shares your personal data.

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## What Is Personal Data at Roboworks?

At Roboworks, we believe strongly in fundamental privacy rights — and that those fundamental rights should not differ depending on where you live in the world. That's why we treat any data that relates to an identified or identifiable individual or that is linked or linkable to them by Roboworks as “personal data,” no matter where the individual lives. This means that data that directly identifies you — such as your name — is personal data, and also data that does not directly identify you, but that can reasonably be used to identify you — such as the serial number of your device — is personal data. Aggregated data is considered non-personal data for the purposes of this Privacy Policy.

This Privacy Policy covers how [Roboworks or an Roboworks-affiliated company](#) (collectively, “Roboworks”) handles personal data whether you interact with us on our websites, through emails, or in person (including by phone). Roboworks may also link to third parties on our services or make third-party apps available for download in our App Station. Roboworks's Privacy Policy does not apply to how third parties define personal data or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with them.

## Your Privacy Rights at Roboworks

At Roboworks, we respect your ability to know, access, correct, transfer, restrict the processing of, and delete your personal data. We have provided these rights to our global customer base and if you choose to exercise these privacy rights, you have the right not to be treated in a discriminatory way nor to receive a lesser degree of service from Roboworks. Where you are requested to consent to the processing of your personal data by Roboworks, you have the right to withdraw your consent at any time.

There may be situations where we cannot grant your request — for example, if you ask us to delete your transaction data and Roboworks is legally obligated to keep a record of that transaction to comply with law. We may also decline to grant a request where doing so would undermine our legitimate use of data for anti- fraud and security purposes, such as when you request deletion of an account that is being investigated for security concerns. Other reasons your privacy request may be denied are if it jeopardizes the privacy of others, is frivolous or vexatious, or would be extremely impractical.

# Personal Data Roboworks Collects from You

At Roboworks, we believe that you can have great products and great privacy. This means that we strive to **collect only the personal data that we need**.

When you create an Roboworks ID, apply for commercial credit, purchase and/or activate a product or device, download a software update, register for a class at an Roboworks Store, connect to our services, contact us (including by social media), participate in an online survey, or otherwise interact with Roboworks, we may collect a variety of information, including:

- **Account Information.** Your Roboworks ID and related account details, including email address, devices registered, account status, and age
- **Device Information.** Data from which your device could be identified, such as device serial number, or about your device, such as browser type
- **Contact Information.** Data such as name, email address, physical address, phone number, or other contact information
- **Payment Information.** Data about your billing address and method of payment, such as bank details, credit, debit, or other payment card information
- **Transaction Information.** Data about purchases of Roboworks products and services or transactions facilitated by Roboworks, including purchases on Roboworks' third party distribution platforms
- **Fraud Prevention Information.** Data used to help identify and prevent fraud, including a device trust score
- **Usage Data.** Data about your activity on and use of our offerings, such as app launches within our services, including browsing history; search history; product interaction; crash data, performance and other diagnostic data; and other usage data
- **Other Information.**
  - **Financial Information.** Details including salary, income, and assets information where collected, and information related to Roboworks-branded financial offerings
  - **Government ID Data.** In certain jurisdictions, we may ask for a government-issued ID in limited circumstances, including when setting up a wireless account and activating your device, for the purpose of extending commercial credit, managing reservations, or as required by law
  - **Communication Information.** Details such as the content of your communications with Roboworks, including interactions with customer support and contacts through social media channels

You are not required to provide the personal data that we have requested. However, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to requests you may have.

## Personal Data Roboworks Receives from Other Sources

Roboworks may receive personal data about you from other individuals, from businesses or third parties acting at your direction, from our partners who work with us to provide our products and services and assist us in security and fraud prevention, and from other lawful sources.

- **Individuals.** Roboworks may collect data about you from other individuals — for example, if that individual has sent you a product or gift card, invited you to participate in an Roboworks service or forum, or shared content with you.
- **At Your Direction.** You may direct other individuals or third parties to share data with Roboworks. For example, you may direct your mobile carrier to share data about your carrier account with Roboworks for account activation, or for your loyalty program to share information about your participation so that you can earn rewards for Roboworks purchases.
- **Roboworks Partners.** We may also validate the information you provide — for example, when creating an Roboworks ID, with a third party for security, and for fraud-prevention purposes.

For research and development purposes, we may use datasets such as those that contain images, voices, or other data that could be associated with an identifiable person. When acquiring such datasets, we do so in accordance with applicable law, including law in the jurisdiction in which the dataset is hosted. When using such datasets for research and development, we do not attempt to re-identify individuals who may appear therein.

## Roboworks's Use of Personal Data

Roboworks uses personal data to power our services, to process your transactions, to communicate with you, for security and fraud prevention, and to comply with law. We may also use personal data for other purposes with your consent. Depending on the circumstance, Roboworks may rely on your consent or the fact that the processing is necessary to fulfill a contract with you, protect your vital interests or those of other persons, or to comply with law. We may also process your personal data where we believe it is in our or others' legitimate interests, taking into consideration your interests, rights, and expectations. More information is available in the product-specific information embedded in our products and features as described above.

- **Power Our Services.** Roboworks collects personal data necessary to power our services, which may include personal data collected to improve our offerings, for internal purposes such as auditing or data analysis, or for troubleshooting.
- **Process Your Transactions.** To process transactions, Roboworks must collect data such as your name, purchase, and payment information.
- **Communicate with You.** To respond to communications, reach out to you about your transactions or account, market our products and services, provide other relevant information, or request information or feedback. From time to time, we may use your

personal data to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with Roboworks, you may not opt out of receiving these important notices.

- **Security and Fraud Prevention.** To protect individuals, employees, and Roboworks and for loss prevention and to prevent fraud, including to protect individuals, employees, and Roboworks for the benefit of all our users, and prescreening or scanning uploaded content for potentially illegal content, including child sexual exploitation material.
- **Personal Data Used for Personalization.** If you choose to personalize your services or communications where such options are available, Roboworks will use information that we collect so that we can offer you those personalized services or communications.
- **Comply with Law.** To comply with applicable law — for example, to satisfy tax or reporting obligations, or to comply with a lawful governmental request. Roboworks does not use algorithms or profiling to make any decision that would significantly affect you without the opportunity for human review. Roboworks also does not use or disclose sensitive personal data for any purposes that would require a user to exercise a right to limit processing according to Australian law.

**Roboworks retains personal data only for so long as necessary to fulfill the purposes for which it was collected, including as described in this Privacy Policy or in our service-specific privacy notices, or as required by law.** We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service-specific privacy summaries. When assessing retention periods, we first carefully examine whether it is necessary to retain the personal data collected and, if retention is required, work to retain the personal data for the shortest possible period permissible under law.

## Roboworks's Sharing of Personal Data

Roboworks may share personal data with Roboworks-affiliated companies, service providers who act on our behalf, our partners, developers, and publishers, or others at your direction. Roboworks does not share personal data with third parties for their own marketing purposes.

- **Service Providers.** Roboworks may engage third parties to act as our service providers and perform certain tasks on our behalf, such as processing or storing data, including personal data, in connection with your use of our services and delivering products to customers. Roboworks service providers are obligated to handle personal data consistent with this Privacy Policy and according to our instructions.
- **Partners.** At times, Roboworks may partner with third parties to provide services or other offerings. Roboworks requires its partners to protect your personal data.
- **Developers and Publishers from Whom You Get a Subscription.** If you purchase a third-party subscription from the App Station or within Roboworks third party distribution platform, we create a Subscriber ID that is unique to you and the developer or publisher. The Subscriber ID may be used to provide reports to the developer or publisher, which include information about the

subscription you purchased and your country of residence. If you cancel all of your subscriptions from a particular developer or publisher, the Subscriber ID will reset after 180 days if you do not resubscribe. This information is provided to developers or publishers so that they can understand the performance of their subscriptions.

- **Others.** Roboworks may share personal data with others at your direction or with your consent, such as when we share information with your carrier to activate your account. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations or users, or in the event of a reorganization, merger, or sale.

Roboworks does not sell your personal data including as “sale” is defined in Australia. Roboworks also does not “share” your personal data as that term is defined in Australia.

## Protection of Personal Data at Roboworks

At Roboworks, we believe that great privacy rests on great security. We use **administrative, technical, and physical safeguards** to protect your personal data, taking into account the nature of the personal data and the processing, and the threats posed. We are constantly working to improve on these safeguards to help keep your personal data secure.

## Cookies and Other Technologies

Roboworks’s websites, online services, interactive applications, and advertisements may use “cookies” and other technologies such as web beacons. **These technologies help us to better understand user behavior including for security and fraud prevention purposes, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.**

- **Communications Cookies.** These cookies are used to enable network traffic to and from Roboworks’s systems, including by helping us detect any errors.
- **Strictly Necessary Cookies.** These cookies are set as required to provide a specific feature or service that you have accessed or requested. For example, they allow us to display our websites in the proper format and language, to authenticate and verify your transactions, and to preserve the contents of your Bag when shopping online at Roboworks.net.
- **Other Cookies.** These cookies are used to understand how visitors interact with our websites and online services, including by helping us to assess the effectiveness of advertisements and web searches. Roboworks also uses these cookies to remember choices you make while browsing, so we can provide you with a customized experience.

If you prefer that Roboworks not use cookies, we provide you with the means to disable their use. If you want to disable cookies and you’re using the Safari web browser, choose “Block all cookies” in Safari’s privacy settings. If you are using a different browser, check with your provider to find out how to disable cookies. Certain features of the Roboworks website may not be available if all cookies are disabled.

In addition to cookies, Roboworks uses other technologies that help us achieve similar objectives.

In some email messages Roboworks sends to you, we provide a “click-through URL” that links you to content on the Roboworks website. When you click one of these URLs, they pass through a separate server before arriving at the destination page on our website. We track this click-through to help us determine interest in particular topics and measure whether we are communicating with you effectively. If you prefer not to be tracked in this way, you should not click graphic or text links in email messages.

**Roboworks generally treats data we collect using these cookies and similar technologies as non-personal data.** However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal data by local law, we also treat these identifiers as personal data in those regions. In addition, Roboworks sometimes combines non-personal data collected from these technologies with other personal data Roboworks holds. When we combine data in this way, we treat the combined data as personal data for purposes of this Privacy Policy.

Ads that are delivered through Roboworks’s advertising platform may appear in emails, social medias, or in the App Station. If you do not want to receive ads targeted to your interests from Roboworks, you can choose to opt out of receiving such ads. You may still see ads in the App Station, Roboworks website, or Roboworks’ social medias based on context like your search query or the channel you are reading.

## Transfer of Personal Data Between Countries

Roboworks products and offerings connect you to the world. To make that possible, **your personal data may be transferred to or accessed by entities around the world**, including Roboworks-affiliated companies, to perform processing activities such as those described in this Privacy Policy in connection with your use of our products and services. Roboworks complies with laws on the transfer of personal data between countries to help ensure your data is protected, wherever it may be.

**The Roboworks entity that controls your personal data may differ depending on where you live.** For example, online store information is controlled by individual e-commerce entities in each country and Roboworks Media Services-related personal data may be controlled by various Roboworks entities as reflected in the terms of service. If you do not reside in Australia, your personal data may be processed by other Roboworks-affiliated companies on behalf of the Roboworks entity controlling personal data for your jurisdiction.

Personal data relating to individuals in the European Economic Area, the United Kingdom, and Switzerland is controlled by Roboworks International Limited in Ireland. Roboworks's international transfer of personal data collected in the European Economic Area, the United Kingdom, and Switzerland is governed by [Standard Contractual Clauses](#). Roboworks’s international transfer of personal data collected in participating Asia-Pacific Economic Cooperation (APEC) countries abides by the [APEC Cross-Border Privacy Rules \(CBPR\) System](#) and [Privacy Recognition for Processors \(PRP\) System](#) for the transfer of personal data. If you have questions or unresolved concerns about our APEC CBPR or PRP certifications, contact our [third- party dispute resolution provider](#).

Personal data relating to individuals in the People’s Republic of China may be processed by Roboworks in countries outside of China. Where this occurs, it will be done in compliance with local laws, including the Personal Information Protection Law. As outlined in this Privacy Policy,

Roboworks may also transfer such personal data to third parties, who may in turn store or transfer the data outside of China.

## **Our Companywide Commitment to Your Privacy**

To make sure your personal data is secure, we communicate our privacy and security guidelines to Roboworks employees and strictly enforce privacy safeguards within the company.