

## CR Robotics Privacy Policy

As a social enterprise our vision is to make a difference and improve the lives of those who need a bit of help to stay independent. We are passionate about providing support to a wide range of people to improve their quality of life. We are also passionate about privacy. We strive to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

This policy (together with our Terms and Conditions and any other documents referred to in such Terms of Use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, and applies to all of your personal data irrespective of the medium or method by which we obtained/received your personal data.

In this policy, the term “**personal data**” means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession and includes personal data as described in Data Protection Legislation.

This policy explains how we use your personal data. We want to help you understand how we work with your data, so that you can be in control of your information and we invite you to spend a few moments understanding this policy. We may update this policy, and if we make any changes, we will notify you when we do so. We will provide you with the opportunity to review such changes. By continuing to use our products after the changes have been made and we have notified you, the way we use your personal data will be subject to the terms of the updated policy.

This policy covers:

1. Who we are
2. Personal data that we hold and how we get it
3. How we use your personal data
4. Are there cases where we may use your information to contact you?
5. Do we protect your personal data?
6. Sharing your data
7. Retention Period
8. Data Storage
9. Data Security and Transfer
10. Your Data Protection Rights
11. Cookies

If you have any further questions about how we process your information, please don't hesitate to get in touch by contacting our Data Protection Officer:

Email us at: [info@heymylo.com](mailto:info@heymylo.com)

Call us: +353(0)15314741

Or write to us at: GDPR, CR Robotics Limited, Clonmannon House, Clonmannon, Ashford, Co. Wicklow, A67 HF74

## 1. Who we are

CR Robotics (Ireland: 618201 and UK NI667661 is part of the Castle Rook Group which includes Castle Rook Ireland (565826) and Castle Rook UK (09541246). The registered offices are Clonmannon House, Clonmannon, Ashford, Co. Wicklow. A67 HF74 and Office 39, Banbridge Enterprise Centre, Scarva Road Industrial Estate, Banbridge BT32 3QD. Northern Ireland.

When this policy talks about “Mylo”, “us” or “we”, it means Castle Rook Limited. We provide your data to other companies within our corporate group, including CR Robotics Limited, which develops and maintains our software.

Your relationship is with CR Robotics Limited. If for example, you would like to access your data, CR Robotics is the entity to which you would make such a request.

## 2. Personal data that we hold and how we get it

We fully respect your right to privacy in relation to your interactions with the Robot and App, we endeavour to be transparent in our dealings with you as to what information we will collect and how we will use your information. Also, we only collect and use your details where we have your consent to do so, and where we are legally entitled to do so. Information in relation to personal data collected by Irish entities is available on [www.dataprotection.ie](http://www.dataprotection.ie), the website of the Irish Data Protection Commissioner (“**DPC**”).

We will handle your personal data in accordance with Data Protection Legislation. “**Data Protection Legislation**” means the Data Protection Acts 1988 and 2003 and Directive 95/46/EC, any other applicable law or regulation relating to the processing of personal data and to privacy (including the E-Privacy Directive), as such legislation shall be amended, revised or replaced from time to time, including by operation of the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) (and laws implementing or supplementing the GDPR).

We only collect and use individual user details where we have your consent to do so, or it is necessary for the performance of a contract between us and you, or it is necessary for our legitimate interests, and where we are legally entitled to do so under Data Protection Legislation.

We use the following categories of personal data:

### *Personal Data*

When you register and complete a purchase with us, you will complete a form providing us with basic information about yourself, such as your name, date of birth, physical address, phone number, email address and medical information. You will also provide us with the contact details of your primary contact. You are responsible for the accuracy of the information that you provide to us.

We may also receive personal information from you when using the messaging function through the robot, these messages will be discarded and not retained.

### *Health and Medical Information*

The main type of information we hold about you is health information related to your physical health and mental wellbeing before and during the use of our technologies. This may include information such as your heart rate and sleeping habits; medication information and general use of the robot's functions. Your interactions with our digital services may be shared with our team for the purpose of providing you with a better experience and care.

We ask for your explicit consent to process this data and we obtain this consent when you take actions that provide us with this data. We get this information from you, when you register with us, when you use the functions of the robot and when you wear the associated smartwatch. You can use your account settings and tools to withdraw your consent at any time, including stopping the use of the watch or unpairing your robot.

#### *Financial information*

When you make any payments, your credit/debit card details are processed directly by a third party processor that will store all payment information and transaction details. We will only retain details of transactions on secure servers and we will not retain your credit or debit card information.

#### *Technical information and analytics*

When you use our App, robot or visit our website, we may automatically collect the following information where this is permitted by your device or browser settings: technical information, including the address used to connect your mobile phone or other device to the Internet, your login information, system and operating system platform type and version, device model, browser or app version, time zone setting, language and location preferences, wireless carrier and your location (based on IP address); and information about your usage (such as when you use the App, and the functions you viewed or used, App response times and updates, interaction information (such as button presses or the times and frequency of your interactions with the communications we deliver to you in the App or otherwise)

#### *Geolocation information*

Some of our functions include the use of geolocation data, including GPS signals, device sensors and Wi-Fi access points. We collect this type of data if you grant us access to your location. You can always remove our access using your Fitbit device or mobile device settings. We may also derive your approximate location from your IP address.

#### *Information from third parties*

If you choose to connect your account on our services to your account on another service, we may receive information from the other service. For example, if you connect to Amazon or Google, we may receive information like your name, profile picture, age range, language, email address. You can stop sharing the information from the other service with us by removing our access to that other service.

We retain any correspondence and interactions with you, this can include your use of

our chatbot service, surveys and interviews. This is to ensure that we can provide a high quality service and with your consent, allow us to learn and improve our service. To monitor our service quality, we may retain records of when you contact our support teams via email, phone or through interactive video call. Recordings are held securely in accordance with our retention policy and you will be told at the beginning of the meeting if the recording will be taking place. These will be used for training purposes and to improve the service we provide to you. Please refer to the 'Retention' section of this policy for further information.

### **3. How we use your data**

With your consent, we use your data to continuously learn and improve our services. To monitor our service quality, we may retain records of when you contact our support teams via email, phone or our interactive chatbot.

The purpose for which we use your personal data and the legal grounds on which we do so are as follows:

1. Providing you a service
2. Improving our products and services
  - Where you have provided your explicit consent, we will use your health and wellbeing information (always having removed personal identifiers, such as your name and address) to improve our healthcare products, services and our artificial intelligence system, so that we can deliver better healthcare to you and other Mylo users. This may include information filled in forms, given in interviews and interactions and function use of the robot. This does not involve making any decisions which would have a significant effect on you - it is only about improving our products, services and software so that we achieve our aim of improving quality of life. Strict confidentiality and data security provisions apply at all times.
  - We may obtain and use data about your precise location from the app, watch or robot in scenarios such as emergencies. We may also derive your approximate location from your IP address.
3. Keeping you up to date
  - We use your email address, phone number and/or details to contact you or present you with occasional updates and marketing messages where you have not opted out, based on legitimate interest in marketing our further services and products that may be of interest to you. You may subject your right to opt out at any time.
  - As part of providing you with a high quality service, we may contact you by email or phonecall to offer you helpful information or invite you to make appointments for example for demonstrations on how to get the best use of Mylo.
4. Other uses
  - Based on our legitimate interest in managing and developing our business, we may analyse data about your use of our products and services to troubleshoot bugs, forecast demand and to understand trends of use, including which feature users use the most and find the most helpful and what further features users require from us. This does not involve making any decisions about you that would have a significant legal effect on you; it is only about improving our App and software so that we can provide a better service. Strict confidentiality and data security provisions will apply at all times.

- Where necessary, we may need to share personal and financial details for the purposes of fraud prevention and detection.
- To comply with applicable laws, rules and regulations and any regulatory mandate or court order; and
- To protect the safety of any person, to address fraud, security or technical issues.

We wish to remind you that this Policy applies to personal data that we collect/process through your use of the App, Robot and website. It does not apply to any links to third-parties' websites, and/or services, such as third-party applications, that you may encounter when you use the App. You acknowledge that the service that we provide may enable or assist you to access the website content of, correspond with, and purchase products and services from, third parties via third-party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your personal data. We do not endorse or approve any third-party website nor the content of any of the third-party website made available via the App or Robot. We encourage you to carefully familiarize yourself with terms of use and privacy policies applicable to any website, apps and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any third parties.

#### **4. Are there cases where we may use your information to contact you?**

We may contact you:

- for administration reasons related to our services (e.g. to provide you with password reminders or to notify you that a particular service, activity or online content has been suspended for maintenance, or in response to a question that you ask us);
- to provide you with information about our services, activities or online content. You should only receive e-newsletters or similar correspondence and updates from us if you have agreed to in response to any contact you have made with us, e.g. during the registration process or on the App, by email or via the 'How to contact us' facility. I
- to offer you content, services, or other products and services, including to develop new services and products;
- to provide you with news and newsletters, special offers, promotions, and targeted advertising, to the extent permitted by applicable law;
- to communicate with or contact you concerning your account or membership or your usage of or participation in the App or our services, and for other customer service; and
- to invite you to participate in surveys about our services (participation is always voluntary).

Where we wish to use your personal information in any other way, we will ensure that we notify you and get your consent first.

#### **5. Do we protect your personal information?**

We do our utmost to protect user privacy through the appropriate use of security technology. We restrict access to personal data to employees, contractors and agents who need to know such personal data in order to operate, develop or improve the services that we provide. We ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. However, the App may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and/or apps and your use of such websites and/or apps is at your own risk.

We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of your personal data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of any data transmitted to our App and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that the App may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorised disclosure, loss or destruction of your personal data arising from such risks.

## **6. Sharing your data**

We may share your personal data with members of our corporate group and our partners. This is to help us deliver our services to you, such as make regular software upgrades and product maintenance for your Mylo.

We may share your personal data with companies we have hired to provide services on our behalf, including those who act as data processors on our behalf, acting strictly under contract in accordance with Article 28 GDPR. Those data processors are bound by strict confidentiality and data security provisions, and they can only use your data in the ways specified by us.

Our partners are listed as below:

- Ross Kernan Marketing Limited
- Sanbot Robot Co., LTD

We may preserve or disclose information about you to comply with a law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of our services or the physical safety of any person

#### Anonymised information

We may display on our website or share with our partners aggregated and anonymised data that does not personally identify you, but which shows general data trends, for example, the number of users of our service.

Except as described above, we will never share your personal information with any other party without your consent.

Any third parties who access your personal data in the course of providing services to you on our behalf are subject to strict contractual restrictions to ensure that your personal data are protected, in compliance with Data Protection Legislation.

### **7. Retention Periods**

We will retain your data in accordance with best practice procedures provided by GDPR and the Data Protection Act 2018. Once your contract has come to an end, we will continue to hold your personal data for a period of 5 years. Once this period is completed, we will either completely erase all personal data that we no longer require and anonymise any remaining data that we believe is for legitimate business reasons such as managing and planning our business or further development to improve our service.

### **8. Data Storage**

#### Personal Data

All data collected is securely transferred from Mylo and associated technologies (website, watch, App) via APIs and is stored in Mongo Databases. This is part of a secured server managed by CR Robotics and Ross Kernan Marketing Limited. Any hard copies of data will be stored securely at Clonmannon House, Clonmannon, Ashford, CO. Wicklow, Republic of Ireland. A67 HF74.

#### Image Files

Data collected by Mylo devices and its relevant applications will be stored in CDN spaces, which can be accessed via URLs. Data subjects can request to delete the information, and we will process the request in 30 days.

All collected data is bound by strict confidentiality and data security provisions, and can be erased on your request, taking a maximum of 28 days to process this request.

We do not store any credit or debit card information. Payments are processed via a third-party payment provider that is fully compliant with Level 1 Payment Card Industry (PCI) data security standards. Any payment transactions are encrypted using SSL technology. (check this with Wendy). We will only retain details of transactions on secure servers and we will not retain your credit or debit card information.

## **9. Data security and transfers**

We do not store your personal health data on your mobile device. We store all your personal health data on secure servers.

We encrypt data transmitted to and from the App. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Your data may be processed or stored via destinations outside of the UK and the European Economic Area (EEA), but always in accordance with data protection law, including mechanisms to lawfully transfer data across borders, and subject to strict safeguards. For example, we work with third parties who help deliver our services to you, whose servers may be located outside the UK or EEA. For further information on the safeguards we take if we transfer data outside of the EEA, contact ... add our new DPO email address

## **10. Breach Reporting**

We will notify serious data breaches to the DPC without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned justification for the delay; however, it is not necessary to notify the DPC where the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. A personal data breach in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

We will keep a record of any data breaches, including their effects and the remedial action taken, and will notify you of any data breach affecting your personal data (which poses a high risk to you) when we are required to do so under Data Protection Legislation. We will not be required to notify you of a data breach where:

- we have implemented appropriate technical and organisational measures that render the personal data unintelligible to anyone not authorised to access it, such as encryption; or
- we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or
- it would involve disproportionate effort, in which case we may make a public communication instead.

## **11. Your data protection rights**

As indicated above, whenever we rely on your consent to process your personal data, you have the right to withdraw your consent at any time.

You also have specific rights under the GDPR and DPA to:

- Withdraw your consent at any time (insert how to withdraw consent here - can they go onto privacy settings?)
- Request a copy of the information that we hold about you (subject to our retention periods)
- Ask us to rectify or erase information we hold about you
- Ask us to restrict our processing of your personal data or object to our processing - Ask for your data to be provided to you on a portable basis

If you make a request, we have one month to respond to you. If you exercise any of these rights, we have 28 days to process your request.

### **Right to complain to the DPC**

If you do not think that we have processed your personal data in accordance with this Policy, please contact us in the first instance. If you are not satisfied, you can complain to the DPC or exercise any of your other rights pursuant to Data Protection Legislation. Information about how to do this is available on the DPC App at <https://www.dataprotection.ie>

## **12. Cookies**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology. For further information, visit <https://www.allaboutcookies.org/>. You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

We use cookies in a range of ways to improve your experience on our website, including keeping you signed and understanding how you use our website.

There are a number of different types of cookies, however, our website uses:

### Functionality

We use these cookies to recognize you on our website and remember your previously selected preferences. These could include what language you prefer and your location. A mix of first-party and third-party cookies are used.

### Advertising

We use these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.