

# **Privacy and Cookie Policy – Blue Ocean Robotics Group**

This Privacy and Cookie Policy was last modified on 20 April 2023

# 1. Data Controller

Blue Ocean Robotics ApS Company registration no.: 34885478 ("Blue Ocean Robotics")

UVD Robots ApS Company registration no.: 38235745 ("UVD Robots ApS)

GoBe Robots ApS Company registration no.: 40664599 ("GoBe Robots ApS")

PTR Robots ApS Company registration no.: 38196057 ("PTR Robots ApS")

(together referred to as the "Blue Ocean Robotics Group", "we", "us")

- 1.1. The Blue Ocean Robotics Group has created this Cookie and Privacy Policy to explain the types of personal data the Blue Ocean Robotics Group and its affiliates collects from you as you navigate through our website (the "Website") and use our services (the "Services"), and how that information will be used and disclosed.
- 1.2. The individual company listed in section 1 above will be responsible for the processing of personal data carried out by that company, and the individual company will therefore be the data controller in relation to any processing activity carried out by that company.
- 1.3. Please read this Policy carefully.

# 2. What This Policy Covers

- 2.1. The Blue Ocean Robotics Group takes the privacy and protection of personal information very seriously. By visiting the Website and using the Services or by registering for the Services and creating an account, you acknowledge to have read and understood the practices and policies outlined in this privacy and cookie policy (the "Policy"). Unless otherwise defined herein, capitalized terms shall have the meanings assigned to such terms in the Policy or in the Terms of Use which you can find on our terms of use page, and which incorporate this Policy by reference.
- 2.2. This Policy does not apply to the use of your Personal Information that is collected by third parties which the Blue Ocean Robotics Group does not own or control or which do not support the Blue Ocean Robotics Group Robots in providing the Services.



- 2.3. "Personal Information" is information that is personally identifiable like names, addresses, e-mail addresses or phone numbers, as well as other non-public information that is associated with the foregoing.
- 2.4. "Anonymous Information" means information that is not associated with or linked to your Personal Information; Anonymous Information does not permit the identification of individual persons. We collect and use Personal Information and Anonymous Information as described in this Policy from Users.
- 2.5. YOUR PERSONAL INFORMATION MAY BE PROCESSED IN THE COUNTRY WHERE IT WAS COLLECTED AS WELL AS OTHER COUNTRIES (INCLUDING THE UNITED STATES) WHERE LAWS REGARDING PROCESSING OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.
- 2.6. The Blue Ocean Robotics Group only transfers Personal Information from the EU/EAA to third countries or international organisations if the conditions laid down in Chapter V of the General Data Protection Regulation or corresponding national legislations are fulfilled.

# 3. Personal Information We Collect

- 3.1. We collect the following Personal Information that you submit to us voluntarily
  - If you register for the Services and create an Account to become a Member, we collect your name, a username, your email address, and a password for your Account.
  - When you register for the Services, we may also collect additional information on an optional basis, including, but not limited to, the city, state, and country where you live, and the company you work for.
  - When you contact us by sending us an e-mail, we will collect any information that is contained in (and/or attached to) your email.
- 3.2. We do not process any special categories of Personal Information (sensitive data).

# Feedback

3.3. If you provide feedback about the Services to us, we may use and disclose such feedback for any purpose, provided we do not associate such feedback with your Personal Information. We will collect any information contained in such feedback and will treat the Personal Information in it in accordance with this Policy.

# 4. Personal Information Collected Via Technology (Cookies)

- 4.1. As you use the Services or Website, certain information may also be collected passively, including your Internet protocol address (IP) and the browser that you use to visit the Website.
- 4.2. The Blue Ocean Robotics Group also stores a small text file called a "Cookie" on your computer to store your login information (if any) and your personal preferences for the Services. The Blue Ocean Robotics Group may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them). While you will still be able to use the Services if you disable Cookies in your browser, certain parts of the Services may not function as effectively.

# How Do We Use Cookies?

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- 4.3. On our Website, we use cookies to:
  - · Remember your display preferences, such as contrast color settings or font size
  - Remember if you have already replied to a survey pop-up that asks you if the content was helpful or not (so you will not be asked again)
  - · Remember if you have agreed (or not) to the use of cookies on the Website
  - · Help the performance of the Website
  - Anonymously provide us with analytics with respect to the overall usage and traffic on the Website
  - Track your first visit to the Website and the number of times you have visited the Website
  - · Track how you reached the Website
  - Track the number of pages on the Website that you visited
  - · Personalize the content you see on the Website
- 4.4. Also, some videos embedded in pages on the Website use a cookie to anonymously gather statistics on how you got there and what videos you visited.
- 4.5. Enabling these cookies is not strictly necessary in order for the Website to work but it will provide you with a better browsing experience. You can delete or block these cookies as allowed by your browser, but if you do, some features of this site may not work as intended.

#### Do We Use Other Cookies?

- 4.6. We may use tracking cookies to provide us with information needed for advertising.
- 4.7. If we use such cookies, you will find a description of the individual cookies known to us at the end of this policy.

#### How to Control Cookies

- 4.8. You can control and/or delete cookies as allowed by your browser for details, see http://www.aboutcookies.org/. You can delete cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, you may have to manually adjust some preferences every time you visit a website and some services and functionalities may not work.
- 4.9. Since the foregoing information may be collected when you are signed into the Services, this information may be associated by us with Personal Information that we have collected from you.

#### Aggregate Information

- 4.10. When visiting our Website, we track the referring URL (the webpage you left before coming to our Website) and the pages, links and graphics of the Website that you visit. This allows us to compile aggregate statistics about the Website's usage and allows us to gauge the popularity and effectiveness of specific webpages and any promotional programs we may be running. This information is gathered globally and is not personally identifiable.
- 4.11. Some of your browsing sessions may be translated into information that helps website designers make websites easier to use and simpler to navigate. If you would like to disable this tracking, please click here: <a href="http://www.clicktale.net/disable.html">http://www.clicktale.net/disable.html</a>.

#### Behavioral Advertising Networks – Advertising

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- 4.12. We may use cookies to collect your device ID and other information about the device you are using to visit the Website. We do that so that we may be able to use third-party advertising companies to serve ads to you on other websites after you visit the Website.
- 4.13. These advertising companies may use information (not including your name, address, email address, or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: www.networkadvertising.org/managing/opt\_out.asp.

# 5. Personal Information from Other Sources

5.1. We may receive Personal Information about you from outside the Website, such as telephone, fax, e-mail, or from third parties that provide services for us that are related to the Services. We may add this information to the information we have already collected from you via the Services.

#### 6. Use Of Information We Collect/Purpose of Collecting Information

- 6.1. In general, information (including Personal Information) you submit to us, or to third parties that support us in collecting information, is used by us to provide you and others with the Services, to respond to requests that you make, to improve our Services and to better tailor the features, performance and support of the Services.
- 6.2. We may also use your Personal Information to provide you with notifications related to your use of the Services, such as electronic newsletters or promotional emails, should you request to receive such communications from us, cf. clause 7 below.
- 6.3. We may create Anonymous Information records from Personal Information by excluding information (such as your name) that makes the information personally identifiable to you. We may also create Anonymous Information on how you use the Services. We may use this Anonymous Information for internal purposes, such as analyzing usage patterns so that we may enhance the Services, and we also reserve the right to use and disclose any Anonymous Information at our discretion.
- 6.4. We do not process your personal data for any other purpose than the above.
- 6.5. Our processing of your personal data collected in connection with your use of our Website and Services is based on our legitimate interest in furnishing you with information about our Services, products, events etc.

## 7. Newsletters and Contact Forms

#### Newsletters

- 7.1. When signing up for our newsletter the Blue Ocean Robotics Group register the following personal information:
  - · Email address
  - · Name
  - Occupation
- 7.2. The information is only used for the purpose of sending you newsletters that you have subscribed to.



7.3. You can unsubscribe to our newsletter at any time. When unsubscribing your personal information will be deleted immediately. We will include unsubscribe instructions in each newsletter or promotional communication you receive from us.

# Contact Forms

- 7.4. When you fill out our Contact Form the Blue Ocean Robotics Group registers the following personal information:
  - · Email address
  - · Name
  - · Phone number
- 7.5. When a request concerns only one company within the Blue Ocean Robotics Group, respectively UVD Robots, GoBe Robots or PTR Robots, the registered personal information may be disclosed to other companies within the Blue Ocean Robotics Group. Any disclosures is in accordance and compliance with the GDPR.
- 7.6. When the processing of your request is no longer necessary, we delete all collected personal information.
- 7.7. The Blue Ocean Robotics Group reviews all registered personal information on a quarterly basis, in order to make sure that we do not store information that we no longer have a basis for processing.

# 8. Your rights under the General Data Protection Regulation (GDPR) and Lei Geral de Proteção de Dados Pessoais "LGPD" (Brazil)

#### Right to access, rectification etc.

8.1. You are entitled to be informed of the personal information which the Blue Ocean Robotics Group is processing. You also have the right to have incorrect personal information corrected and request that the Blue Ocean Robotics Group erase some or all of your personal information. However, the Blue Ocean Robotics Group will not erase personal information if there are legal reasons for further processing, including if there is a need for retaining the information in accordance with relevant legislation on bookkeeping, if claims are not time barred etc.

#### Right to object

8.2. You are at any time entitled to object to the processing of your personal information. This is due to a balance between the interests of both parties. If there are no legitimate considerations that weigh heavier than your interest in ceasing the processing of your information, or legal reasons to continue processing, the processing will cease.

#### Data portability

8.3. You are entitled to receive all personal data processed based on your access to the Website, Services and Account with the Blue Ocean Robotics Group, transferred from the Blue Ocean Robotics Group to another data controller (i.e., Data Portability Right). The Blue Ocean Robotics Group may send your personal information to the designated recipient of the information per. encrypted email and in many cases collected in excel files.

#### Requests and complaints

8.4. The request to exercise any of the rights listed above is addressed to Blue Ocean Robotics. The request must be in writing and signed by you as an applicant and sent to the email address info@blue-ocean-robotics.com.

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8.5. You are also entitled at any time to contact the Blue Ocean Robotics Group or the Danish Data Protection Agency for reporting a complaint about the processing of Personal Information. The Danish Data Protection Agency can be contacted on <u>dt@datatilsynet.dk</u>.

# 9. Your Rights Under the California Consumer Privacy Act (CCPA) if you are a California Resident

# Right to know

9.1. You are entitled to be informed of the personal information which the Blue Ocean Robotics Group is processing. You may request that the Blue Ocean Robotics Group disclose to you what personal information we have collected, used or shared about you, and why we have done so for the 12-month period preceding your request. the Blue Ocean Robotics Group will provide this information to you free of charge.

# Right to delete

9.2. You have the right to have incorrect personal information corrected and request that the Blue Ocean Robotics Group erase some or all of your personal information. However, the Blue Ocean Robotics Group will not erase personal information if there are legal reasons for further processing, including if there is a need for retaining the information in accordance with relevant legislation on bookkeeping, if claims are not time barred etc.

#### Right to opt-out

9.3. The Blue Ocean Robotics Group does not sell your personal information to any third party and is therefore not subject to the rule on having a "Do Not Sell My Personal Information" link in our privacy policy or on our website.

# Right to non-discrimination for exercising your CCPA rights

9.4. The Blue Ocean Robotics Group will not deny you robots or services, charge you with a different price, or provide a different level of quality of robots or services with the reason that you exercised the above mentioned rights.

# Requests and complaints

9.5. The request to exercise any of the rights listed above is addressed to the Blue Ocean Robotics Group. The request to the Blue Ocean Robotics Group must be in writing and signed by you as an applicant and sent to the email address info@blue-ocean-robotics.com. You are also entitled at any time to contact the Company or the Danish Data Protection Agency for reporting a complaint about the Blue Ocean Robotics Groups' processing of Personal Information. The Danish Data Protection Agency can be contacted on dt@datatilsynet.dk.

#### **10.** Disclosure of Personal Information

- 10.1. Except as otherwise stated in this Policy, we do not disclose to or share your Personal Information with third parties, unless you ask or authorize us to do so.
- 10.2. the Blue Ocean Robotics Group does not sell your personal information to any third party and is therefore not subject to the rule on having a "Do Not Sell My Personal Information" link in our privacy policy or on the Website, cf. clause 9.3 above.
- 10.3. We may provide your Personal Information to third party service providers and suppliers who work on behalf of or with us to provide you with some of the Services and features of the Services and to help us



communicate with our Users. However, these service providers and suppliers do not have any independent right to use this information except to help us provide the Services.

- 10.4. Companies within the Blue Ocean Robotics Group may share some or all of your Personal Information amongst the group companies, hereunder with any subsidiaries, joint ventures, or other companies under a common control (collectively, "Affiliates"), in which case the Blue Ocean Robotics Group will require the Affiliates to honour this Privacy Policy.
- 10.5. In the event a company within the Blue Ocean Robotics Group goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your Personal Information will likely be among the assets transferred. You acknowledge that such transfers may occur, and that any acquirer of a company within the Blue Ocean Robotics Group or its assets may continue to use your Personal Information as set forth in this Policy.
- 10.6. We may disclose information we have collected from and about you (including Personal Information) if we believe in good faith that such disclosure is necessary to (a) comply with relevant laws or to respond to subpoenas or warrants served on us; (b) to enforce any agreement we may have entered into with you and to enforce the Policy; or (c) to protect and defend the rights or property of us, other Users, or third parties.

# **11.** Choices Regarding Personal Information

11.1. We may send you service-related announcements (such as, but not limited to, notice that we have changed the Services, the Terms of Use, or the Privacy Policy) when we believe it is necessary to do so. You may not opt-out of these communications, which are not promotional in nature, but if you do not wish to receive these announcements, you have the option to terminate the Account you may have with us. You understand that any termination of your Account may involve deletion of your Account information (and associated Content) from our live databases and all the information and data stored for such Account in the Services. The Blue Ocean Robotics Group will not have any liability whatsoever to you for any termination of your account or related deletion of your information.

#### 12. Retention of Personal Information

- 12.1. We will retain your Personal Information only as long as it is necessary to meet our business needs or to comply with applicable legal and regulatory requirements.
- 12.2. Your Personal information is primarily stored in digital media, and when we no longer need to retain your Personal Information, we will dispose of your Personal Information, whether stored in digital media or in hard copies, in a secure manner.
- 12.3. When we delete information that we have collected from or about you, it will be deleted from our active databases as well as our archives.

# 13. Links to Other Websites

13.1. The Services may contain links to third-party websites ("Third-Party Websites") (a) placed by us as a service to those interested in this information; or (b) posted by other Members. You understand that we do not monitor or have any control over and make no claim or representation regarding Third-Party Websites. To the extent such links are provided by us, they are provided only as a convenience, and such link to a Third-Party Website does not imply our endorsement, responsibility, adoption or sponsorship of,



or affiliation with, such Third-Party Website. We have no control over, do not review and are not responsible for the privacy policies of or content displayed on such other websites. Please be aware that the terms of the Privacy Policy do not apply to any external websites.

# 14. Privacy of Minors

14.1. We do not intentionally collect or maintain information from persons under the age of 13.

#### 15. Security and Confidentiality

15.1. The Blue Ocean Robotics Group has put in place commercially reasonable and appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online. We will continually monitor these measures to establish that they continue to be appropriate. If we find that they are not appropriate, we will update and change our measures to keep your Personal Data secure. However, no company, including companies within the Blue Ocean Robotics Group, can fully eliminate security risks associated with Personal Information.

# 16. Changes in this Privacy Policy

16.1. As part of the Terms of Use, this Policy is subject to occasional amendment, in accordance with the Terms of Use.

## 17. Contact Us

17.1. If you have any questions or suggestions regarding our Privacy Policy please contact us. The Blue Ocean Robotics Groups has appointed a point of contact. The point of contact can be contacted on gdpr@blue-ocean-robotics.com.