

## **Privacy Policy** **Cobot Lift ApS - Privacy Policy**

Cobot Lift ApS ("**Cobot Lift**" or "**CL**") takes processing of personal data very seriously. Cobot Lift ensures a realistic and transparent processing of personal data in accordance with all applicable laws, local and global regulations, along with the European Union's General Data Protection Regulation ("**GDPR**"). Cobot Lift protects private information and the privacy of individuals within all areas of its business performance in accordance with the terms of given Privacy Policy of Cobot Lift ApS ("**Privacy Policy**").

### **1. Personal Data and Data Subject**

For the purpose of given Cobot Lift's Privacy Policy, "**personal data**" stands for any information related to an identified or an identifiable person also known as "**data subject**". An identifiable person is an individual, who can be directly or indirectly identified, for example by applying reference to first and last names, identification number or online identifiers.

**Personal Data** is generally classified as "**ordinary personal data**" or "**sensitive personal data**".

**Sensitive Personal Data** is characterized as a confidential information, which includes racial or ethnic origin, political opinions, religious beliefs, trade union memberships, genetic and biometric and also health and sexual orientation data.

**Ordinary Personal Data** is characterized as a partly confidential information, which includes statistics regarding criminal offences, national identification numbers, records concerning individual's salary, pension, debt, application materials and also all other different types of ordinary personal data, including name, customer number, business contact information like email address, phone number, photos, IP-address, and other usage facts gathered through cookies. Given Privacy Policy applies to all personal data Cobot Lift is currently collecting and processing about all individuals, including company's employees, visitors, customers, distributors, suppliers and also third-party service providers.

### **2. Principles of Personal Data Protection**

In order to ensure the protection of personal data in accordance with GDPR, Cobot Lift complies with the following principles:

#### **Purpose Limitation**

Cobot Lift can only collect and possess personal data, which includes sensitive information for specified, explicit and legitimate purposes applicable for the business of Cobot Lift.

#### **Lawfulness, Fairness and Transparency**

Personal data have to be processed lawfully, fairly and also in a transparent manner in the relation to the information subject. Where legally required, Cobot Lift will inform the individuals about the motive for processing their personal data, their rights to have their personal data rectified, deleted or blocked and also about company's identity and responsibility for the collection and processing of their personal data.

#### **Data Minimization**

Cobot Lift can only collect and process personal data adequate, applicable and limited to what is required in relation to purposes for which they are processed.

#### **Accuracy**

In order to ensure that personal data processes are accurate and precise, Cobot Lift has to ensure that personal data is reviewed, monitored and updated in proper and regular intervals, where they are appropriate.

#### **Storage Limitation**

Personal data has to be stored only for the certain period of time required to fulfil company's purpose and moreover, as prescribed by law.

### **Integrity and Confidentiality**

Within the framework of processing personal data, it is critical that such data should be safeguarded by sufficient and relevant security measures in order to decrease the following risks like data loss, unauthorized access, destruction and also accidental disclosure.

### **Cross Border Data Transfer**

Specific rules should be applied when Cobot Lift transfers personal data from the EU/EEA to the 3<sup>rd</sup> countries or international businesses as described further in the data switch paragraph below.

### **Accountability**

In order to ensure that personal data processing is implemented according to GDPR, Cobot Lift has taken relevant technical and organizational measures, which are reviewed and updated on a regular basis.

### **3. Owner and Data Controller**

Cobot Lift is the owner ("**Owner**") and data controller ("**Data Controller**") of the personal data covered within given Privacy Policy.

#### **Contact Details:**

Cobot Lift ApS  
CVR: 39510693  
Industrivej 6, 4200 Slagelse, Denmark  
Phone: +45 30 72 14 60  
Email: info@cobotlift.com  
Website: <https://cobotlift.com/>

For any questions regarding company's Privacy Policy and processing of personal data, please contact Cobot Lift.

### **4. Types and Purpose of Personal Data Collection**

Cobot Lift collects and processes personal data, that includes sensitive information only for specified, explicit and legitimate goals applicable for Cobot Lift's business performance. The reason of the collection and processing of personal data also relies upon on the type of data subjects. Responsible departments and their employees, who possess access to personal data have to comply with the legal requirements and principles of given Privacy Policy's set of internal guidelines.

### **Employment**

Cobot Lift collects and processes personal data, which includes sensitive information of applicants, candidates and employees for employment purposes according to legal requirements.

### **Visitors**

Cobot Lift collects and processes of personal information of visitors, which includes name, title and contact info for safety reasons and registers relevant information in the visitor's log prior to granting site visitors access to Cobot Lift's premises.

### **Website Users**

Within the framework of marketing, advertising, and analytics purposes, contacting company's website users, managing contacts and sending messages, remarketing and behavioral targeting, Cobot Lift collects personal information about its website users, which as a rule usually includes the following elements like cookies, usage data, name, contact details and also company information. Within operation and maintenance purposes, Cobot Lift along with any other third-party service provider companies might also acquire files that record user's interaction with company's website ("**System Logs**"). Such personal data is acquired through website users' consent and permission in case of data usage and collected automatically on Cobot Lift's website. Cobot Lift's website doesn't support "**Do Not Track**" requests. In order to decide whether any of the third-party services it exploits honor the "**Do Not Track**" requests, please kindly get familiar with their privacy policies.

Online users are in charge of any third-party personal data obtained, published or shared via website and verify that they have the third party's consent to grant with such personal data to Cobot Lift. Online users, who are uncertain about what personal data is obligatory are welcome to contact Cobot Lift.

### **Cookies**

Any usage of cookies or other relevant tracking tools by website or proprietors of third-party services used by the website serves the goal of providing the offerings required with the aid of the user, in addition to any other goals described in the following Privacy and Cookies Policies. Cobot Lift applies cookies to understand and save online users' preferences for future visits and assemble aggregate data about site visitors and website interaction so that we can provide better website experiences and tools in the future. Cobot Lift can also contract with third-party service provider companies in order to assist in higher perception of Cobot Lift's website visitors. These service provider companies are not permitted to use the information gathered on Cobot Lift's behalf except to ensure company's excellent business performance.

### **Marketing**

Cobot Lift collects and processes personal data including initials and contact details about existing and new customers, business partners, suppliers, third-party service providers, distributors, leads, individuals, website users and also other individuals, who have signed up for Cobot Lift' e-newsletters or other digital marketing materials, as well as in some cases for the following purposes like analytics, contacting, managing contacts, sending messages, remarketing, behavioral targeting, advertising and exhibitions. These types of personal data are accumulated and processed within marketing consent. Cobot Lift obtains legitimate consent via an online form. Company's marketing department along with other departments have to ensure that marketing consent is acquired before gathering and processing such personal data. Cobot Lift can also use third parties as a service provider to send out marketing data on its behalf, but solely in accordance with applicable legal requirements. For any questions related to marketing information, please contact Cobot Lift at [info@cobotlift.com](mailto:info@cobotlift.com)

### **Contracts, Purchase Orders and Other Transactional Agreements**

In connection with company's sales and purchase transactions, Cobot Lift collects and processes personal data, which includes the first and last name, contact and deliver details, correspondence and payment details required for performing business and complying with export compliance regulations and other legal due diligence obligations.

### **Accounting and Finance**

According to applicable requirements, Cobot Lift collects personal data for accounting and financial goals. This data is represented to accounting by other internal departments or received directly from individuals, companies, employees, and consists of the following information like name, address, company name, registration number, payments info, bank details, delivery address and other relevant mandatory information.

### **Legal Actions**

In case of a dispute, Cobot Lift is authorized to retain personal information required for its legitimate interest in order to ensure that company can properly deliver or protect legal claims at court or during the stages that lead to possible legal action. Cobot Lift may also need to share this information with third parties like insurance and legal advisers and also may be additionally required to reveal personal data upon public authorities' request.

### **Reporting System**

Cobot Lift respects confidentiality of whistle-blowers and has a certain channel for such reporting with electronic and digital systems. Cobot Lift collects and processes personal data within its reporting system for conducting investigations and also taking remedial or legal actions according to given Privacy Policy's legal requirements.

### **Consent and Withdrawal of Consent**

To the extent that Cobot Lift's processing activities are primarily based on your consent, you have a full right to withdraw your consent at any time. If you withdraw your consent, we will terminate to process your personal data, until and to the extent that persisted processing

is permitted or required in accordance to the relevant private data regulations or other applicable laws. If you withdraw your consent, it will not have an effect on the lawfulness of processing carried out prior to the withdrawal. Where personal data is processed for a public interest, in the exercising of an official authority vested in Cobot Lift or for the purpose of the legitimate interests pursued by means of Cobot Lift, a person may also object to such processing via imparting a ground associated to the individual's particular state of affairs to justify the objection. However, if personal data is processed for direct advertising and marketing purposes, a person can object to such processing at any time and without any justification through contacting Cobot Lift.

## **5. Legal Grounds for Processing of Personal Data**

Cobot Lift is obliged to process personal data, if one of the following options are applied:

- Individual or company has given prior consent to processing of his/her/their personal data for one or more particular purposes. NOTE: According to certain legislations Cobot Lift may additionally be allowed to process personal data till above mentioned individual or company object to such processing ("**opt-out**") without having to rely on consent or any other relevant legal bases. This, however, does no longer apply, every time the processing of personal data is subject to European Data Protection law;
- processing of data is critical for the overall performance of a contract and for any pre-contractual duties thereof;
- processing is fundamental for compliance with any legal obligations; processing of your personal data is imperative to establish, practice or defend any criminal claims;
- processing is associated to a task that is carried out in the public interests or in the exercising of legitimate authority vested in Cobot Lift;
- processing is imperative for the purposes of the legitimate interests pursued by Cobot Lift or third party, if such interests are not considered to override individual or company's interests or fundamental rights. Such legitimate interests may be Cobot Lift's interests in developing, marketing, promoting products and services, pursuing and preserving business relationship with customers, suppliers, distributors and other business partners.

Upon request, Cobot Lift will provide information in order to clarify the particular legal basis, which applies to the processing, and in particular whether the provision of personal data is a statutory and contractual requirement or even a requirement necessary to enter into a contract.

## **6. Place and Data Transfer**

Personal information is processed at Cobot Lift's HQ and in any different places, where third parties are engaged in data processing. Specific regulations apply when Cobot Lift transfers personal data from the EU/EEA to third countries or international companies. Within the framework of transferring personal data to third countries or international companies, Cobot Lift is obliged to set up relevant safeguards prior to the transfer that in practice are established by entering standard contractual clauses of the European Commission. According to GDPR, Cobot Lift has concluded Data Processing Agreement (DPA), Joint Data Controller Agreement (JDCA) and also agreements with Standard Contractual Clauses (SCCs) with exterior parties and affiliated companies, as applicable.

## **7. Retention Period**

Personal information gathered Cobot Lift should be processed and stored for as long as required within the purpose for which the personal data has been collected. Cobot Lift may additionally be allowed to preserve personal data for a longer period of time, if Cobot Lift has got legitimate consent to the processing activity as long as such consent is not withdrawn. Moreover, Cobot Lift is also ought to hold the personal data for a longer period of time, whenever it is required to do so for the overall performance of a legal duty or to establish, exercise or defend a legal claim. Once the retention duration expires, personal data should be deleted by Cobot Lift. Hereby, the right to access, erasure, rectification and data portability can't be accommodated after expiration of the retention period.

## **8. Data Security and Data Breach**

Cobot Lift takes relevant security measures in order to prevent and avoid unauthorized access, disclosure, modification and destruction of private data. Data processing is conducted based on using computers or IT enabled tools, following organizational methods and modes that are strictly related to the indicated purposes. In order to defend your personal data, we continuously evaluate any risks that may be associated with our personal data processing. In particular, we pay attention to the protection of your personal information against discrimination, identity theft, monetary loss, reputation loss and confidentiality of data. In order to prevent and avoid personal data loss, we constantly backup our systems, and we make use of encryption or other security measures where it is necessary. Finally, we educate our employees in managing personal data. In case of data breach with a high risk to the violation of your rights, we will notify you about it as soon as possible under given circumstances. "**Personal Data Breach**" stands for a breach of security, which leads to accidental or illegal destruction, loss, alteration, unauthorized disclosure and even access to personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted, disclosed appropriate authorization or if the information is transformed unavailable. If you experience, witness or suspect a personal data breach, please immediately report Cobot Lift.

## **9. Individuals' Rights**

Where legally required, Cobot Lift should inform individuals of the purpose of processing their personal information, rights to have their personal information rectified, deleted and blocked, and also the identity of the company, which is responsible for personal data collection and process. In all other cases, online users should request Cobot Lift to identify what rights should be applied to them. Individuals' rights are represented by the following aspects:

### **Withdrawal of Consent**

Right to withdraw at any time a previously given consent to the processing of user's personal data.

### **Object to Personal Data Processing**

Right to object to the personal data processing, if such processing is conducted on a legal basis other than consent. Further clarifications are represented in the dedicated part of Cobot Lift's Privacy Policy.

### **Access to Personal Data**

Right to know about if personal data is being processed by Cobot Lift, gain disclosure related to specific aspects of the processing and gain a cope of the undergoing data processing.

### **Verify and Seek Rectification**

Right to verify the accuracy of user's personal data and request for its update or amendment.

### **Restriction of Personal Data Processing**

Right beneath certain circumstances to restrict user's personal data processing. In this case, Cobot Lift will no longer process mentioned personal data for any purposes other than storing it.

### **Deleted Personal Data or Otherwise Removed**

Right below certain circumstances to acquire the erasure of user's personal data from Cobot Lift.

### **Transfer of Personal Data to Another Data Controller**

Right under certain circumstances to have personal data transmitted to other controller except any difficulties.

### **Complain Lodge**

Right to bring a claim before user's competent data protection authorities.

## **10. Training**

In order to prevent and avoid any violation of applicable law, regulations and corporate standards, Cobot Lift will organize formalized GDPR training sessions for its employees according to company's training program. Training on personal data protection will be performed through digital communication, webinars or in-site physical trainings. All company's

employees will be trained on basic GDPR principles and have more advanced theoretical and practical sessions on personal data processing primarily based on business needs.

### **11. Ongoing Audit and Monitoring**

Through a mixture of exterior and internal controls, ongoing audit and monitoring, Cobot Lift makes great efforts to maintain a safe processing of personal data and also prevent or avoid loss of data. In case of audit findings, the responsible branch must put together a mitigation plan, consisting of corrective and preventive actions to mitigate risks and bring procedures and policies in compliance with legal requirements, corporate standards and company's Privacy Policy.

### **12. Reporting System and Contact Details**

In case of questions or any possible violations Privacy Policy, please feel free to contact Cobot Lift:

Cobot Lift ApS  
Industrivej 6  
4200 Slagelse  
Denmark  
Phone: +45 30 72 14 60  
E-mail: [info@cobotlift.com](mailto:info@cobotlift.com)

Your request can be exercised free of charge and will be also addressed as expeditiously as possible within 3-4 weeks or sooner, if required by relevant applicable law.

### **13. Privacy Policy Changes**

Cobot Lift reserves the right to amend given Privacy Policy. Latest version of Privacy Policy will be updated at our website, and we strongly recommend you screen and update yourself with our Privacy Policy on a regular basis.