



GENERIC PRIVACY POLICY

Last Update: 6 July 2020

This Privacy Policy sets out when and how C2RO uses and protects any information that you give us when you use this website. C2RO is committed to providing safe websites for visitors of all ages and has implemented this Privacy Policy to demonstrate our firm commitment to your privacy.

Although you are not required to register to access our website, you may be asked to provide us with personal information when you visit certain sections of our website. Your use of and interaction with our website signifies your acknowledgement and consent to our Privacy Policy.

Please note this Privacy Policy does not cover the processing of Personal Information by any of C2RO products or technologies such as C2RO Perceive. If you are interested in C2RO Perceive Product Data Privacy Policy as it relates to please check www.c2ro.com/perceive-privacy-policy.

INTRODUCTION

C2RO Cloud Robotics Inc. (“**C2RO**” also referred to as “**we**” or “**us**”) understands and respects the importance of any information it collects on an identified or identifiable individual (“**Personal Information**”) using this website. C2RO has developed the present Privacy Policy to describe the way it processes that is to say collects, uses, stores and communicates your Personal Information in compliance with Canadian federal and provincial data protection legislation (“**Privacy Laws**”).

This Privacy Policy also describes the data protection rights an individual whose Personal Information is collected by this website (“**Data Subject**” or “**you**”) may exercise and how to exercise them.

Some provisions may exceed regulatory requirements. In such circumstances, C2RO has full discretion concerning their application.

We invite you to contact our Chief Privacy Officer, with any questions concerning this or any other C2RO data protection notice.

WHO WE ARE

C2RO is an AI enterprise software company based in Montreal, Canada. It offers Privacy-aware AI video analytics for physical spaces using proprietary edge-cloud AI and computer vision technologies. C2RO’s main product, Perceive, provides businesses with a scalable and robust

analytics tool for data-driven decision making, ensuring safety measures, and helping them transform their physical facilities into engaging and immersive environments for visitors. C2RO solutions are built for scale and reuse existing surveillance cameras while being compliant with the most restrictive data privacy regulations in the world.

C2RO assumes full responsibility for the information it collects via the website and has appointed a Chief Privacy Officer (“CPO”) located in Canada, and a “Data Protection Officer” (“DPO”) located in Europe to oversee the compliance of C2RO with the Privacy Laws.

C2RO Contact Details

55 Mont-Royal W., Unit 970
Montréal, Québec, Canada
H2T 2S5

T: (438) 771-5367 | E: info@c2ro.com

To Contact C2RO Data Protection Officer (Europe)

[Dr. Gérard HAAS](#)

HAAS AVOCATS
32, rue la Boétie
75008 PARIS
FRANCE
T: (+33) 156-436-880
E: dpo@c2ro.com

To Contact C2RO Chief Privacy Officer (North America)

[Dr. Soodeh FAROKHI](#)

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Montréal, Québec, Canada
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T: (+1) 438-771-5367
E: privacy@c2ro.com

WHAT WE COLLECT WHEN YOU VISIT OUR WEBSITE

- We collect information that you voluntarily provide us through responses to blog posts, surveys and contact forms. We may also ask you to provide additional information such as your e-mail address if you want to obtain additional services, information, or to resolve complaints or concerns.
- Whenever you visit the C2RO website, C2RO receives and records information on our server logs from your browser, including your computer's or mobile device's operating system type and version, browser type and language, your Internet Protocol (IP) address, and geographic

areas derived from your IP address, C2RO cookie information, file information, time-stamped logs regarding access times and duration of visits, the websites you visited before coming to C2RO websites, and other usage data relating to your activities on our Sites, including the pages you request. We may relate this information to the Personal Information you provide for purposes described in this Privacy Policy.

- C2RO also collects certain personal information when you request publicly available resources through our website or when you fill out our contact form. In these cases, you may provide us with your name, job title, company name and URL, industry, and contact information, such as e-mail address, phone number, and address. We may also collect your information as it relates to our product and services.

WHAT WE DO WITH THE COLLECTED INFORMATION

The collected information regarding the online visitors of our website may be used in the aggregate for research and development relating to our website and/or for future site development and upon your request, to send you promotional materials. In particular, we may use information gathered about you for the following purposes:

- To monitor interest in our range of products and to assist us in tailoring the content of our website to your needs by collecting information about your preferences through tracking of patterns page views on our website.
- To understand our audience and their interests in publicly available resources through our websites including our product sheets, customer use cases, whitepapers, blog posts, and so on.
- Respond to your comments, questions, or inquiries regarding available website resources.
- In circumstances where you have indicated that you wish to receive additional information, to send you information about us and promotional material about our products together with details of any offers we may have available from time to time.
- C2RO uses Google Analytics plugin to analyse internet traffic on its website. If you are interested in Google Analytics Privacy Policy as it relates to please check <https://policies.google.com/privacy>.
- C2RO may track your IP addresses for system administration, to report aggregate information, site tracking, to prevent our servers from being abused.

HOW WE MAY DISCLOSE YOUR PERSONAL INFORMATION

C2RO will not disclose personal information that you provide on its website to any third parties except under the following circumstances:

- We reserve the right to disclose anonymized and aggregated information to appropriate authorities to protect our rights, as well as to investigate fraud, or to respond to a law

enforcement request. We may also disclose it to authorities designated by applicable laws such as in conjunction with a subpoena, a government inquiry, litigation, dispute resolution or similar legal process (including lawful access by a foreign court, law enforcement or government agency). We may also disclose it if you are reporting an adverse event/side effect, in which case C2RO may be required to disclose such information to bodies such as, but not limited to, Canadian and/or international regulatory authorities.

- We may share some or all of your information with our current or future "affiliates" (which means a parent company, any subsidiaries, joint ventures, or other companies under common control), in which case we will require our affiliates to honour this Privacy Policy.

Please note that any of these disclosures may involve the storage or processing of Personal Information outside of Canada and may, therefore, be subject to different privacy laws than those applicable in Canada, including laws that require the disclosure of personal information to governmental authorities under circumstances that are different than those that apply in Canada.

HOW WE USE COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about webpage traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Moreover, you can also choose to accept or decline cookies in our website at your first visit. Our website uses cookies to improve your experience while you navigate through the website. Out of these cookies, the cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyze and understand how you use this website. These cookies will

be stored in your browser only with your consent. You also have the option to opt-out of these cookies. Opting out of some of these cookies may have an effect on your browsing experience.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you click on these links and leave our site, please be aware that C2RO does not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. Such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We are committed to ensuring that your information is secure. C2RO is committed to protecting the confidentiality, integrity, availability and privacy of your Personal Information. As an organization, C2RO employs security safeguards that are customary in the software industry. We have put in place the physical, organizational, and technological measures necessary to protect the confidentiality, integrity and accessibility of the information we process based on its level of sensitivity. Examples of such measures include rigorous personnel training, restricted access to information on a need-to-know basis, encryption of information in transit and well-defined internal policies and practices. We have also implemented a thorough data breach mitigation, response, and notification process.

YOUR RIGHTS AND HOW TO EXERCISE THEM

You have various rights in connection with our processing of your Personal Information while using our website. These rights include the rights to access, rectification, objection, restriction, portability and erasure. C2RO has implemented an access request procedure and we invite you to contact us with any questions you may have concerning your privacy or our processing of your Personal Information at privacy@c2ro.com.

In Particular, you may choose to restrict the collection or use of your Personal Information in the following ways while browsing in our website:

- Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by C2RO for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at privacy@c2ro.com.

HOW WE RESPOND TO A REQUEST

C2RO will generally respond to all requests within 28 days of the receipt of all necessary information. In circumstances where C2RO may not be able to provide an answer, or if additional time is required to fulfill a request, we will advise you in writing.

C2RO may not release certain types of information to Data Subjects based upon exemptions specified in applicable laws. Where possible, C2RO will sever the information that will not be disclosed and provide the Data Subject with access to the remaining information. Should C2RO be unable to provide access or disclose Personal Information to the Data Subject, C2RO will provide the Data Subject with an explanation, subject to restrictions.

Data Subjects may learn more about the process or obtain assistance in completing an access request by contacting privacy@c2ro.com.

MONITORING OR OVERSIGHT MECHANISM

The C2RO Follow Up Committee conducts periodic reviews of incidents and issues raised by Data Subjects to identify and address systemic problems. The Committee also ensures that C2RO remains compliant with Privacy Laws and that its security technology offers the highest levels of information protection.

MAINTENANCE AND REVIEW

This Policy is effective as of July 6, 2020, and supersedes all prior versions. The next review is scheduled for July 1, 2021.

C2RO reserves the right to interpret the Policy at its sole discretion and to make changes as it deems appropriate from time to time without the requirement of advance notice.

Privacy Laws continue to evolve and, as a result, this Policy may be amended by C2RO from time to time at the full discretion of C2RO without any prior notice or liability to a Data Subject or any other person. The collection, use, and disclosure of a Data Subject's Personal Information by C2RO will be governed by the version of this Policy in effect at that time.