

Robomow Privacy Policy

Effective: January 1, 2020

I. INTRODUCTION

In the normal course of business, Robomow, its subsidiaries and/or affiliates (“Robomow”) may collect and store Personal Information regarding customers, employees and associates, suppliers, and distributors. Robomow may be collected, transferred, and stored on servers located in any country in which we do business.

Robomow is committed to protecting the privacy and security of Personal Information collected as part of its normal business activities. This Privacy Policy (the “Policy”) applies to all Personal Information that is provided to Robomow in any form or medium, and may be amended from time to time. If our information practices change at some time in the future, we will post the policy changes here as notification and provide you with the ability to opt out of these new uses. If you are concerned about how your information is used, you should check back to our website periodically.

II. INFORMATION WE COLLECT

Robomow may collect your Personal Information through your contacts with us online, in person, over the phone or through the mail. “Personal Information” refers to information that identifies, relates to, describes, or could reasonably be linked (directly or indirectly) with you or your household. Personal Information does not include information that is publicly available, such as a person's name, address and phone number listed in a directory.

Personal Information that we collect includes:

- (i) Contact information such as your name, address, phone number, and e-mail address;
- (ii) If you contact our customer service center, audio recordings of your conversations or transcripts of online chats;
- (iii) Product information such as the serial and model number of products you purchased, where and when the products were purchased, whether the products have been serviced, and communications we have had with you about your product;
- (iv) Information about your shopping preferences, purchases, and purchase orders;
- (v) Survey and demographic information, such as your age, household information, lawn care/outdoor power product ownership/purchase history, employment information (i.e. job title, location, etc.), and your product preferences;
- (vi) Financial and/or economic information such as your credit card or debit card information and other information you may provide at the time of purchase.

III. WHY WE COLLECT PERSONAL INFORMATION

Robomow collects your Personal Information for various purposes:

- (i) We collect contact information and product information for legal and commercial reasons, so we may fulfill requests for products, administer product programs and warranties, respond to customer service inquiries, answer questions about our offerings, and communicate with customers.
- (ii) We maintain records of your contacts with our customer service centers for training and quality control purposes.
- (iii) We also collect contact information and product information to enable us to provide customers with notice of any product advisories or safety notices and as necessary to respond to legal and/or regulatory inquiries.
- (iv) We collect information regarding shopping preferences, survey and demographic information for marketing, advertising and product development purposes. This information enables Robomow to learn about our customers, to develop products that meet their needs and preferences, to create and administer product programs that are of interest to our customers.
- (v) For those who provide Personal Information in the context of their employment with Robomow or as part of an application for employment, Personal Information will be used for employment purposes (i.e. keeping updated organizational information, making hiring and employment related decisions, employee training, employment investigations, etc.).

Robomow limits the collection and use of Personal Information to what is reasonably necessary to fulfill the purpose for which the Personal Information is collected. The Personal Information we collect will only be used for the purposes identified at the time of collection or as outlined in this Policy.

IV. HOW WE COLLECT YOUR PERSONAL INFORMATION

Robomow collects your Personal Information through several sources.

You provide Personal Information to us through our website when you register a product; when you contact our customer service center, whether it is by phone, email, regular mail, or by entering a service request on the website; when you post information through our social media sites; or when you sign up to receive emails and newsletters. We also collect your Personal Information when you register a product via the Robomow app; register products by mail; submit a warranty claim; or bring your product in for service.

When you visit our website, we track and collect information that does not personally identify you but is helpful for administering the site, analyzing trends, tracking user movements, and gathering broad demographic information for aggregate use. This information includes (a) IP address; (b) domain name; (c) type of computer; and (d) type of web browser. As explained further below, our website also utilizes cookies to store information required to determine how to properly deliver content to your machine.

We also collect information from other sources. We may receive your Personal Information from our affiliated entities, authorized dealers and service providers, and

other business partners who assist us in marketing and advertising efforts, customer service support, or product services. We may even get information about you from friends who purchase products for you as a gift or who provide us with your information in response to various marketing campaigns.

V. INFORMATION SHARED WITH THIRD PARTIES

Robomow DOES NOT sell or trade Personal Information. With your consent, Robomow will only use or disclose your Personal Information to a third party for use in a manner that is consistent with the purposes provided in Section III. of this Policy.

Robomow may share your Personal Information with third party service providers in order to provide services on your behalf. These third parties include distributors, authorized dealers, sales representatives, service providers, or other businesses with whom we have partnered to provide a product or service to you. These third parties may need access to information about your or the products you purchased in order to address product-related issues and/or provide warranty services.

In addition, we may provide information to banking and financing partners who provide financing for the purchase of our products.

Robomow may share your Personal Information with companies that provide support services to us such as marketing consultants, printers, web hosting providers, call center/chat providers, payment processors, shipping services providers or other third parties that help us market our products and services. These companies may need access to information about you in order to perform these services. However, we do not consent or authorize these companies to use the information we disclose to them for any other purpose.

VI. OUR COMMITMENT TO CHILDREN'S PRIVACY

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our website from those we know are under the age of 13. If a child has provided us with Personally Information, a parent/guardian may follow the procedures below to access a child's information and to request the information be deleted from our records. Following such a request, we will make reasonable efforts to delete the child's information from our records.

Consumers who are at least 13 and less than 16 years of age may provide their Personal Information.

VII. REQUESTS TO KNOW

You may contact us to request the Personal Information we maintain about you. If you wish to know the Personal Information which we have collected about you over the preceding twelve (12) months, you can submit a request for this information by contacting our toll-free number at 1-800-269-6215, submitting a service request via our website at <https://usa.robomow.com/service-and-support/service-request/> or by submitting a written request to:

Robomow
Information Privacy Department
P.O. Box 368022
Cleveland, OH 44136

Should you wish to designate someone other than yourself who is authorized to make a request for your Personal Information, please contact us in writing, either by mail or email, at the address listed above.

In order to protect your privacy and the integrity of your Personal Information, Robomow will ask you to verify your identity and/or verify that you are authorized to make a request under this section. To that end, you may be asked to provide your website account information (if you have one), provide information regarding a product that you have registered, or verify certain Personal Information previously provided to us before we provide any information in response to this request. For additional information about this process, see *Section IX. Access, Rectification, Suppression and Rejection* below.

Robomow will not discriminate against you for exercising your rights under this Section.

VIII. REQUESTS TO OPT-OUT OR DELETE YOUR PERSONAL INFORMATION

If at any time you do not wish to continue receiving information from us or you would like us to delete the Personal Information which we have collected over the preceding twelve (12) months, you can submit a request to opt-out and/or delete your Personal Information from our records. You can do so by contacting our toll-free number at 1-800-269-6215, by submitting a service request on our website at <https://usa.robomow.com/service-and-support/service-request/> or by submitting a written request to:

Robomow
Information Privacy Department
P.O. Box 368022
Cleveland, OH 44136

Should you wish to designate someone other than yourself to make a request to opt-out or delete your Personal Information, please contact us in writing, either by mail or email, at the address listed above.

In order to protect your privacy and the integrity of your Personal Information, Robomow will ask you to verify your identity and/or verify that you are authorized to make a request under this section. To that end, you may be asked to provide your website account information (if you have one), provide information regarding a product that you have registered, or verify certain Personal Information previously provided to us before undertaking any actions to delete your information.

Please note, however, that Robomow may not delete Personal Information that is necessary for the following:

- a) meeting applicable legal requirements, such as carrying out warranty obligations, providing safety advisories and notices, responding to legal or regulatory inquiries, preserving information relevant to a legal claim or lawsuit; and

- b) in the case of information provided by employees, information that is necessary for making promotions, appointments, or other employment decisions. For certain more sensitive Personal Information (which may include race, gender, religion, medical information, etc.) Robomow will provide an affirmative or explicit (opt in) choice if the personal information is to be disclosed to a third party for use in a manner incompatible with the purpose for which it was collected.

Robomow will not discriminate against you for exercising your rights under this Section.

IX. ACCESS, RECTIFICATION, SUPPRESSION AND REJECTION

As owner of the Personal Information you provide to us, you are entitled to access the Personal Information we possess and the details of the processing of such information; rectify the information whenever it is incomplete or imprecise; suppress the information if you deem it is not required for the purposes set forth herein, or if it is being used for purposes not consented; or otherwise, object to the processing of the Personal Information provided for specific objectives.

You may update, remove, or correct your Personal Information on record with us by logging into your account (if applicable), or by contacting us through the methods outlines in Sections *VII. Requests to Know* and *VIII. Requests To Opt-Out Or Delete Your Personal Information* above. To protect your privacy and security, we also take reasonable steps to verify your identity before granting access or making corrections. We will respond to all inquiries with respect to updating, removing, or correcting your Personal Information within a reasonable time.

Any application for the exercise of the aforementioned rights must necessarily indicate and include: i) your name and domicile, ii) copy of your official ID (passport, voter's ID, driver's license), iii) a clear and precise description of the Personal Information you wish to access, rectify, suppress or object and any other component which facilitates the obtainment of your data, as well as iv) any other requirement set forth in terms of the applicable law.

Robomow will respond to any complete application within 20 calendar days or the maximum term permitted by the applicable law. Robomow's reply shall indicate if the application for access, rectification, cancellation or objection is appropriate and, in such case, Robomow shall effect its decision within the following 15 calendar days or the maximum term permitted by the applicable law to the date in which the answer was delivered to the owner of the Personal Information or to his or her representative. The terms may be extended pursuant to the applicable provisions. If you are exercising your right of access, Robomow may provide you with electronic copies of your Personal Information.

X. LIMIT USE OR DISCLOSURE

You are entitled to, at any time, to limit the use or disclosure of your Personal Information for the purposes that are not necessary for our legal relationship. If you wish to limit the use of your Personal Information, please contact our Information Privacy Department, stating the purposes for which you wish to limit the use or disclosure of your Personal Information.

Additionally, you may register with public registries of consumers in order to avoid having unwanted information sent to you. For additional information please consult your national or local authority for consumer protection.

XI. ONWARD TRANSFER

Robomow will keep your Personal Information private and will not disclose it to other parties, unless you have granted Robomow permission to transfer your Personal Information or such disclosure is necessary to: (a) comply with federal or state law, a court order or other legal process; (b) protect our rights or property; (c) enforce any of our Terms and Conditions of Use; or (d) in connection with the sale of assets and/or the company. Prior to disclosing Personal Information to a third party, Robomow will apply the aforementioned Notice and Choice principles. Robomow will also confirm that any third party subscribes to these principles and will enter into a written agreement with such third party requiring that the third party provide at least the same level of privacy protection provided by Robomow.

XII. SECURITY

No data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, despite our efforts to protect Personal Information, we cannot ensure or warrant the security of any information you transmit to us online. You transmit all such information at your own risk.

However, once we receive your transmission, we take reasonable measures to ensure that Personal Information is safeguarded at all times. We have put in place appropriate physical, electronic, and managerial procedures to protect against the loss, misuse or alteration of Personal Information under our control. Our data networks are secured and protected by firewalls and other safeguards. In addition to technological measures, we also ensure that Personal Information stored on our premises or stored by our third parties, is secured by other means, including restricting access and using locked and secured storage units.

In the event of a breach of our systems and unless a law enforcement agency informs us that notification would impede a criminal investigation, you will be notified of any unencrypted Personal Information that was or was reasonably believed to have been acquired by an unauthorized person as soon as reasonably possible.

XIII. DATA INTEGRITY

Robomow uses Personal Information only for the purposes for which it was collected or subsequently authorized. To the extent necessary for those purposes, Robomow will take reasonable steps to ensure that Personal Information is accurate, current, complete, and reliable for its intended use.

XIV. ENFORCEMENT

Robomow uses a self-assessment approach to ensure compliance with this Policy. This includes a periodic assessment to verify the Policy is accurate and being adhered to. If you have concerns, contact us by submitting a service request through our website or by writing us at Robomow, Information Privacy Department, P.O. Box 368022,

Cleveland, OH 44136, and Robomow will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information.

XV. USA.Robomow.com

A. Registration

usa.robomow.com has no registration requirement. At usa.robomow.com, you have the can register your recently purchased product, place additional orders, rate and review our products, etc. If you choose not to register, you will be able to access all areas of usa.robomow.com.com that do not require registration.

Whether you choose to register when you visit usa.robomow.com or not we automatically track and collect the following anonymous information that does not personally identify you but is helpful for administering the site, analyzing trends, tracking user movements, and gathering broad demographic information for aggregate use: (a) IP address; (b) domain name; (c) type of computer; and (d) type of Web browser.

The collection, processing, and the use of data collected during the registration process requires your consent. This consent may be declared electronically and as noted above you may withdraw your consent at any time as set out in the *Opt-Out* and *Access Rectification, Suppression and Rejection* sections of this Policy.

B. Cookies

usa.robomow.com.com utilizes cookies for several purposes, including the storage of information required to determine how to properly deliver content to your machine. A cookie is provided to all visitors to usa.robomow.com.com, regardless of whether you create an account.

A cookie is a small piece of information that a Web server stores temporarily using your Web browser and then later retrieves. A cookie is not a way for a Web server to access and find out private information about you. However, once you choose to furnish a website with Personal Information, for example, by registering at one of our websites, this information may be linked to the data stored in the cookie.

The use of cookies is relatively standard and you will likely find them used on most other Web sites. Most browsers are initially set up to accept cookies. If you prefer, you can customize the settings on your browser either to notify you when you receive a cookie or to refuse to accept cookies. Disabling cookies for this website will not impact your ability to use its features or view its content, but you may not be able to take advantage of the website's personalization features.

C. Online Behavioral Advertising

usa.robomow.com engages in Online Behavioral Advertising (OBA) in accordance with the guidelines set forth by the Digital Advertising Alliance. Robomow uses anonymous cookies to track information on your browsing history on usa.robomow.com, and third-party advertising networks use the information to serve ads to you on Robomow's behalf on other sites throughout the Internet. These cookies do not contain personally identifiable information, nor are they linked to any Personal Information collected by Robomow.

You may opt-out of third-party advertising networks by using the Network Advertising Initiative's (NAI's) multi-cookie opt-out mechanism at: http://www.networkadvertising.org/managing/opt_out.asp. These opt-outs are valid only for the computer and browser combination used to opt-out. Clearing cookies will remove these opt-outs since they stored in cookies.

If you opt-out of an NAI third-party advertising network, you will no longer receive ads based on your browsing history from that network. You may, however, continue to receive generalized online advertising.

D. Notice To Persons Accessing This Website Outside Of The United States

If you reside outside the United States, any information you provide to us through this website may be transferred out of your country and into the United States to Robomow and/or any other company that belongs to Robomow's economic group. We do not need additional consent for this transfer. If you do not want your Personal Information to leave your country, please do not submit that information through this website. By providing Personal Information, you explicitly consent to the transfer of your information to the United States. You also consent to the application of U.S. law, as well as local law, to our processing your Personal Information.

E. Limitations

Robomow is responsible for its own content offered on this website. All of the content has been carefully checked and will be complemented and updated regularly. However, Robomow does not guarantee that this content is completely accurate or up to date.

In addition, links to external internet sites are available on this website. Robomow is not responsible for the content or design of these websites and is thus, not liable for the accuracy, completeness or quality of the information available there. Moreover, we are not responsible for the privacy practices of other websites. Please refer to the privacy policies of each website that you visit.

XVI. CHANGES TO THIS PRIVACY POLICY

From time to time, Robomow may use customer information for new purposes not previously disclosed in this privacy Policy. If our information practices change at some time in the future, we will post the policy changes here as notification and provide you with the ability to opt out of these new uses. If you are concerned about how your information is used, you should check back to our website periodically.