

PRIVACY NOTICE

1. Important information and who we are

Privacy Notice

We at Roboteq Greece PC (hereinafter referred to as “Company”, “we”, “us” or “our”) know and care about how your personal data is used and shared, as we take your privacy seriously.

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you provide when you register and/or use Roboteq Helpdesk Platform including any data you may provide when you contact us, when you register with us or sign up to our newsletter or purchase a product or service.

Controller

Roboteq Greece PC is the controller of personal data we process.

If you have any questions about this privacy notice, including any requests to exercise your legal rights (paragraph 9 below), please contact us at privacy.roboteq@mail.nidec.com.

2. Contact Details

Roboteq Greece PC is registered in Greece and has its registered address at Markopoulou Ave., Ntarditsi-Loutsa, Markopoulo 19003, Greece.

E-mail address: privacy.roboteq@mail.nidec.com

3. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier and job title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Transaction Data** includes details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, location based on the IP address, of the devices you use to access this website and/or the Roboteq Helpdesk Platform.
- **Profile Data** includes your username and password, purchases or orders made by the company you represent, your interests, preferences, feedback and survey responses.
- **Communications Metadata** includes date, time and location based on the IP address.
- **AI Generated Data** includes AI generated translations and summaries of your communications.
- **Usage Data** includes information about how you interact with and use our website and/or the Roboteq Helpdesk Platform, products and services.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

4. How is your personal data collected?

We collect data from and about you through your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by phone, email or otherwise:

- apply for our products or services;
- create an account on our website;
- create an account for Roboteq Helpdesk Platform;
- subscribe to our newsletter or publications;
- enter a survey; or
- give us feedback or contact us.

5. How we use your personal data

Legal basis

The GDPR requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract:** Where we need to perform the contract we are about to enter into or have entered into with the company you represent.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we may to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register the company you represent as a new customer	a) Identity Data b) Contact Data	Performance of a contract with the company you represent

To process and deliver orders including managing payments, fees and charge	a) Identity Data b) Contact Data c) Transaction Data	Performance of a contract with the company you represent
To manage our relationship with you or the company you represent, which will include, but is not limited to: a) Notifying you about changes to our terms or privacy notice b) Enhancing customer experience in the Roboteq Helpdesk Platform c) Asking you to leave a review or take a survey d) Communicating with you about products or services supplied to the company you represent e) To receive and respond to your questions about our products and/or services f) Asking you to give us your feedback regarding products purchased or services performed	a) Identity Data b) Contact Data c) Profile Data d) Marketing and Communications Data	a) Performance of a contract with the company you represent b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To use data analytics to improve our website, products, services, customer relationships and experiences	a) Identity Data b) Contact Data c) Profile Data d) Communications Metadata e) AI Generated Data f) Usage Data g) Marketing and Communications Data	a) Performance of a contract with the company you represent b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To make suggestions and recommendations to you about products or services that may be of interest to you	a) Identity Data b) Contact Data c) Profile Data d) Usage Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	e) AI Generated Data f) Marketing and Communications Data	
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you	a) Identity Data b) Contact Data c) Transaction Data d) Profile Data e) Marketing and Communications Data	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)
To carry out market research through your voluntary participation in surveys	a) Identity Data b) Contact Data c) Technical Data d) Usage Data e) Profile Data f) Marketing and Communications Data	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

Opting out of marketing

You can ask to stop sending you marketing communications at any time by clicking on the unsubscribe button in the newsletter or emailing us at privacy.roboteq@mail.nidec.com.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

6. Disclosures of your personal data

Because our support staff are located outside of the EU/EEA, your personal data will be shared with our affiliated companies in the United States and in China. We do this in accordance with the requirements of the General Data Protection Regulation ("GDPR").

We will also share your personal data with our cloud services providers.

We require all third parties and service providers to respect the security of your personal data and to treat it in accordance with the GDPR. We do not allow third parties and service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Where we transfer your personal data to a third party or service provider

based outside the European Economic Area, we take steps to ensure your personal data is adequately protected.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

9. Your legal rights

You have the following rights under the GDPR.

- Request access to your personal data (commonly known as a “subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the right to object any time to the processing of your personal data for direct marketing purposes.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us privacy.roboteq@mail.nidec.com.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10. Contact details

If you have any questions about this privacy notice or about the use of your personal data or you want to exercise your privacy rights, please contact us at privacy.roboteq@mail.nidec.com.

11. Complaints

You have the right to make a complaint at any time to the Hellenic Data Protection Authority for data protection issues (www.dpa.gr).

12. Changes to the privacy notice and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. Use of AI for Summaries in Helpdesk Portal

Roboteq Helpdesk Platform uses artificial intelligence technology to generate summaries of communications you send to us. This helps us respond more efficiently and accurately. When you contact us, the content of your message and related metadata may be processed by AI systems for this purpose.⁰ These AI functions do not make decisions that have legal or similarly significant effects on you. Processing is carried out under the same legal bases described in this notice, including performance of a contract and legitimate interests. You retain all rights under the GDPR in relation to this processing.