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Privacy Policy for Clone Incorporated and Clone Sp. z o.o.

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### 1. Overview

The following data protection information provides you with an overview of the nature and extent of personal data processing carried out by Clone Incorporated and Clone Sp. z o. o.

Personal data is information that is or can be attributed directly or indirectly to your person and can be used to personally identify you.

Every time you visit the Clone website, different kinds of information are exchanged between your end device and our server. This can also include personal data.

The information collected in this way is used, for example, to make the contents of the website available to you and to prevent unauthorized access. Personal information that Clone may collect from you directly includes, but is not limited to, your name, mailing address, email address, telephone number, interest in Clone's and other information that you voluntarily provide. We understand that you are trusting us with this information, and we do not sell, license or give away your personal information. Generally, we will never intentionally disclose your personal information to any third party for their use without your permission.

## 2. What Our Privacy Policy Covers

This privacy policy covers Clone's customer and applies to the personal information that Clone obtains in various contexts, both online and offline, including when you access or use our websites or any other services that link to this privacy policy, communicate with us, engage with us on social media, or participate in any of our programs or events.

We may provide different or additional privacy notices in connection with certain activities. We may also provide additional "just-in-time" notices that may supplement or clarify our privacy practices or provide you with additional choices regarding your personal information.

Our websites may include links to websites and/or applications operated and maintained by third parties. Please note that we have no control over the privacy practices of websites or applications that we do not own. We encourage you to review the privacy practices of those third parties.

### 3. What Personal Information We Collect

The types of personal information we obtain about you depends on how you interact with us and our products and services. When we use the term "personal information," we are referring to information that identifies, relates to, describes, or can be associated with you. The following are the categories and specific types of personal information that we collect:

Basic Identifying Information

Including your full name, alias, postal address, e-mail address, phone number, signature, username or social media handle, or other similar identifiers.

Device Information and Other Unique Identifiers

Including device identifier, internet protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifier, or similar unique identifiers.

## • Internet or Other Network Activity

Including browsing or search history, and information regarding your interactions with our websites, mobile applications, emails, or advertisements.

### Geolocation Data

Including information that permits us to determine your location, such as if you manually provide location information or enable your mobile device to send us precise location information.

### Commercial Information

Including products or services you are interested in.

### User Content

Including your communications with us and any other content you provide (such as social media profiles, photographs, images, videos, survey responses, comments, product reviews, and other content).

## Audio and Visual Information

Including photographs, images, videos, and recordings of your voice (such as when we record customer service calls for quality assurance - you will be informed about, if any, at the beginning of the call.).

### Inferences

Inferences drawn from or created based on any of the information identified above.

# • Job Applicant Information

Including professional or employment-related information (such as education and employment history) and any other information you provide in connection with applying and interviewing for employment at Clone. If we retain you as an employee, this may include, among other things, your Social Security number or taxpayer ID.

### 4. How We Collect Your Personal Information

We collect personal information about you from various sources. For example, we collect and obtain information:

# Directly from you

We collect personal information you provide, such as when you make a preorder, contact us, respond to a survey, apply for a job, or sign up to receive emails, text messages, and/or postal mailings.

• Using cookies and other automatic data collection technologies

When you visit our websites, open or click on emails we send you, or interact with our advertisements, we automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see the "Cookie Policy" section below.

### From Social Media Platforms and Networks

If you interact with us on social media or use features, such as plugins, widgets, or other tools made available by social media platforms or networks (including Instagram, Facebook, Twitter, Google, You Tube, and Discord) in connection with our websites we collect information that you share with us, or that the social media platforms share with us. For more information about the privacy practices of those social media platforms, please review the privacy policies and settings of the social media platforms and networks that you use.

#### From Other Sources

For example, we may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, fraud prevention service providers, vendors that provide services on our behalf, or publicly available sources. We also create information based on our analysis of the information we have collected from you.

# 5. Purposes of data processing, legal basis, legitimate interests

Providing information about Clone's Project

We use your personal information to provide information about our Project such as to receive the preorders, to provide you preorders updates, to send notifications to you related to the Project, to provide a forum for asking questions. We also use your data to arrange investor meetings in case you are interested in,

and to contact you in case you are interested in cooperation (not limited to being an employee).

Providing the personal information is a condition for contacting in order to respond to your preorder request - in this case you are obliged to provide them. Failure to provide them may result in the inability to contact you in response to your pre-order.

Depending on the products and/or services you request, the categories of information used for these purposes may include Basic Identifying Information and Commercial Information.

### Visiting our website

Whenever you visit our website, the browser used on your end device automatically sends information to our website server. The information is then temporarily stored in a log file. We have no influence over this. The following information is also collected without further action on your part and is stored for seven days before being automatically deleted:

- The IP address of the calling internet-enabled device,
- > The date and time of access,
- > The name and URL of the file opened,
- > The website/application that directed the user to our website (referrer URL),

The browser you use, possibly the operating system of your internet-enabled computer, and the name of the access provider.

The legal basis for processing the IP address is GDPR Article 6(1)(f). Our legitimate interest is based on the purposes of data collection listed below. Please note that we cannot, and do not, draw any conclusions about your identity from the data collected.

We use the IP address of your end device and the other data listed above for the following purposes.

- > To ensure trouble-free connection,
- > To ensure that our website/application is easy to use,
- To analyse system security and stability and
- For other administrative purposes.

# • Contacting Clone

You can contact us in different ways. In particular by means of the contact forms provided on our website and by email. The data processing carried out in connection with your contact message can serve different purposes independently of the content of your message. As a rule, we continue to store and process the data provided so that we can take care of your inquiry.

The legal basis for processing your data within the context of contacting us is your consent (according to GDPR Article 6(1)(1)(1a)).

Personal data stored in connection with your inquiry will be deleted as soon as it is no longer required and providing it is not subject to any statutory storage requirements. The necessity of storage is checked at least once a year.

We can commission external service providers (e.g. data centers) to perform the data processing for certain tasks. When Clone cooperates with such service providers, they are bound by contractual agreements to observe data protection to the same extent as we are.

## **Legal Obligations**

We use personal information to comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.

## Building a database of potentially interested customers

As a developing company which has not yet introduced the full product to the market, we need to constantly verify the demand for Clone's Project. This allows us to define what direction of development to take and what will be the interest in our products on the market.

# **Applicant Privacy Policy**

For the purposes of this Applicant Privacy Policy, "personal information" means:

Identifiers such as personal information that identifies, relates to, describes, or is capable of being associated with a particular individual, including but not limited to, personal contact details such as name, alias, title, telephone number, email address, mailing address, Internet Protocol, signature, education, employment, employment history, bank account details, professional or employment-related information such as skills, qualifications, work experience, references, recommendations, and other information included in a resume, CV, application

form, or cover letter or details of your job search including what roles, departments, and locations interest you and similar identifiers.

Personal information is maintained on our servers or those of our service providers, and is accessible by authorized employees and representatives as necessary for the purposes described in this privacy policy.

We realize that individuals trust us to protect their personal information. We maintain reasonable and appropriate physical, electronic, and procedural safeguards designed to help protect your personal information.

Except as otherwise permitted, or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal obligations, or as necessary to resolve disputes.

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

# 6. Applicant and Employee Privacy Policy

# • Data Processing for Employment Purposes

Types of Personal Information Collected

We collect the following categories of personal information from job applicants and employees:

- > Identifying Information: Full name, contact details, date of birth, nationality
- Professional Information:
  - Educational background and qualifications
  - Employment history and references
  - Professional certifications
  - Skills and expertise
- Contact Information: Email address, phone number, postal address

- > Recruitment-Related Information:
  - Application documents (CV, cover letter, interview notes)
  - Assessment and evaluation records
  - Legal Compliance Information:
    - o Social Security number or tax identification number
    - Work authorization documentation
    - o Background check results (where legally permissible)

## Legal Basis for Processing

We process personal information for employment purposes based on the following legal grounds under GDPR:

- Consent: For specific processing activities where explicit consent is required
- 2. Contractual Necessity: Processing necessary for entering or performing an employment contract
- 3. Legal Obligation: Compliance with labor, tax, and employment-related legal requirements
- 4. Legitimate Interests: Where our processing is necessary for our legitimate business interests, balanced against your fundamental rights and freedoms

# • Purpose of Data Processing

We use personal information for:

- Recruitment and selection processes
- Employment contract management
- Payroll and compensation administration
- > Performance evaluation and management
- Professional development and training
- > Compliance with legal and regulatory requirements
- Internal administrative purposes

#### Data Retention

We retain personal information for employment purposes according to the following principles:

- Applicant Data:
  - o Unsuccessful candidates: 12 months after application process
  - o Retained with explicit consent for future opportunities
- > Employee Data:
  - o Active during employment period
  - o Retained for legal and administrative purposes after employment termination as required by applicable laws
  - o 10 years after completing the work

# • Data Subject Rights

You have the following rights regarding your personal information:

- Right to access your personal data
- Right to request correction of inaccurate data
- > Right to request deletion of data
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Right to withdraw consent (where applicable)

# • Data Security

We implement appropriate technical and organizational measures to protect your personal information, including:

- Restricted access to personal data
- Encryption of sensitive information
- Regular security audits

- Employee training on data protection
- Contact for Data Protection Queries

For any questions or to exercise your data protection rights, please contact:

> Email: admin@clonerobotics.com

# • Changes to Privacy Policy

We may update this privacy policy periodically. We recommend reviewing it regularly and will notify you of any significant changes.

## • Consent and Transparency

By providing your personal information, you acknowledge that you have read and understood this privacy policy and consent to the processing of your data as described herein.

### 7. Cookies

We use cookies, web beacons, clear GIF, pixels, internet tags, and other similar tracking technologies (collectively, "tracking technologies") to gather information when you interact with our websites and email communications. Some tracking technologies help us maintain the security of our websites and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions. These tracking technologies are "required" because we need them for the websites to work properly.

The website automatically collects only information contained in cookies. Files (cookies) are text files that are stored on the website user's end device. They are intended for using the website pages. First of all, they contain the name of the website of their origin, their unique number, and the storage time on the end device.

The website operator is the entity that places cookies on the user's end device and has access to them.

The website operator uses cookies in order to:

matching the content of the website to the individual preferences of the user, (first of all, these files recognize his device to display the page according to his preferences);

- preparing statistics that help to learn about the preferences and behavior of users. The analysis of these statistics is anonymous and allows you to adjust the content and appearance of the website to the prevailing trends. Statistics are also used to assess the popularity of the website;
- the ability to log into the website;
- maintaining the user's login on each subsequent page of the website.

The website uses two basic types of files (cookies) - session and permanent. Session files are temporary, they are stored until you leave the website (by entering another page, logging out or turning off the browser). Permanent files are stored on the user's end device until they are deleted by the user or for the time specified in their settings.

The user may at any time change the settings of his browser to block the use of files (cookies) or to obtain information about their placement in his device each time. Other available options can be checked in the settings of your web browser. It should be remembered that most browsers are set to accept saving files (cookies) on the end device by default.

The website operator informs that changes to the settings in the user's web browser may limit access to some functions of the website's website.

The files (cookies) used by the website (placed on the user's end device) may be made available to its partners and the advertiser cooperating with it.

Information on the settings of web browsers is available in its menu (help) or on the website of its manufacturer.

To learn more about the cookie policy, see our Cookie Policy.

# 8. Sharing Your Personal Information

In addition to the specific situations discussed elsewhere in this privacy policy, we disclose personal information in the following circumstances:

# • Corporate Affiliates

We may share personal information with our corporate affiliates, including our parent company, sister companies and subsidiaries including Clone Incorporated and Clone Sp. z o.o. Such corporate affiliates process personal information on our behalf as our service provider, where necessary to provide a product or service that you have requested or in other circumstances with your consent or as permitted or required by law.

#### Service Providers

We share certain personal information with third parties that perform services to support our core business functions and internal operations including: delivering packages with a prototype for testing to people cooperating with Clone (not limited to employees), complying with request for the shipment of prototype of products to or the provision of services by a third party intermediary, sending postal mail, e-mails and text messages, analyzing potential customer data, supporting beacons, processing payments, investigating fraudulent activity, conducting testers surveys, getting to know about opinions about the prototype of product from cooperating people.

# 9. How long do we keep information for?

We will not hold your personal data for longer than is necessary. We keep information about your visit to our Site for different lengths of time depending on what it is used for, anything from a few minutes and up to 2 years unless it is retained for marketing purposes in which case data will be kept until we have not seen any activity from the contact for 2 years.

With images originally posted on social media, the customer may delete the picture from their social media account at any stage. We also delete pictures from our Site in response to requests from customers. Where social media images are not deleted by the customer, we keep them for a maximum of a two year period from the date of posting on our Site.

## 10. How We Protect Your Personal Information

Personal information is maintained on our servers or those of our service providers, and is accessible by authorized employees and representatives as necessary for the purposes described in this privacy policy.

We realize that individuals trust us to protect their personal information. We maintain reasonable and appropriate physical, electronic and procedural safeguards designed to help protect your personal information.

## 11. Your Rights

We respect the right to privacy and we care about data security. For this purpose, it is used, inter alia, secure communication encryption protocol (SSL).

Personal data provided in the forms are treated as confidential and are not visible to unauthorized persons.

Your personal data are processed:

- in accordance with the provisions on the protection of personal data,
- in accordance with the implemented Privacy Policy,

to the extent and for the purpose necessary to the Services provided electronically, to the extent and for the purpose necessary to fulfill legitimate interests (legitimate purposes), and the processing does not violate the rights and freedoms of the data subject to the extent and for the purpose consistent with the consent expressed by you.

Each data subject (if we are their controller) has the right to access data, rectify, delete or limit processing, the right to object, the right to lodge a complaint to the supervisory body (i.e. for example Personal Data Protection Office - in Poland President of the Personal Data Protection Office).

Your data will be processed in an automated manner on our website.

We have not appointed a data protection officer, but if necessary, on topics related to the processing of personal data, you can contact the person supervising the processing of personal data in our company by electronic means at the e-mail address: admin@clonerobotics.com

The deletion of personal data may occur as a result of the withdrawal of consent or filing a legally admissible objection to the processing of personal data.

You can submit a request to access or delete your personal information, or withdraw consent, by contacting at the e-mail address : admin@clonerobotics.com.

### 12. Transmission of Information to Other Countries

Clone Incorporated is a Company from the United States.

If you submit personal information to Clone Incorporated your personal information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. By submitting your personal information to us you agree to the transfer, storage, and processing of your personal information in a country other than your country of residence including, but not necessarily limited to, the United States.

Clone Sp. z o.o. is a Company from Poland and it is a Subsidiary Company of Clone Incorporated.

Information we collect is shared with service providers, some of whom are outside the European Economic Area and the UK, in countries which do not have the same data protection laws as the European Economic Area or the UK. Where we transfer data to these countries, we protect the data in ways which are approved by the European Commission and the UK government, such as ensuring that recipients have Processor Binding Corporate Rules in place, or by asking them to enter into standard contractual clauses (which are data transfer agreements approved by the European Commission).

If you require further information about these safeguards, please contact us at admin@clonerobotics.com.

## 13. Children's Privacy

Our website is not intended for or directed to children under the age of 16. We do not knowingly collect personal information directly from children under the age of 16 without parental consent. If we become aware that a child under the age of 16 has provided us with personal information, we will delete the information from our records.

# 14. Communicating With Us

If you have any questions about our privacy or security practices, you can contact Clone's Controller by mail, telephone, or e-mail: