



PRIVACY POLICY FOR UNIVERSAL ROBOTS ACADEMY

1. Protection of your privacy

Universal Robots A/S ("*Universal Robots*") takes processing of your personal data very seriously. We ensure a reasonable and transparent processing in accordance with the rules on processing of personal data, including the GDPR. This Privacy Policy applies for the personal data Universal Robots collects and process about users of the Universal Robots Academy at <https://academy.universal-robots.com/>

2. Data Controller and contact information

Universal Robots is the data controller regarding the personal data we have received from you.

We can be contacted via the following information:

Universal Robots A/S
Energivej 25
5220 Odense
Denmark
CVR number: 29138060

Contact email: dataprotection@universal-robots.com

Contact telephone number: +45 89 93 89 89

3. Personal data processed about you

We collect information from you when you register as a user on our training site at <https://academy.universal-robots.com/>, or when you use a company or other entity user profile at the site, and we gather data when you participate in the Academy platform by reading, writing, and evaluating the content shared here as well as when purchasing In-class Training.

Some of the personal data we collect is necessary to provide our services to you or your company; other personal data you may choose to provide voluntarily. We will let you know, if and why our processing of your personal data is necessary.

We collect and processes the following categories of "ordinary personal data" according to article 6 of the GDPR:

- **Contact information** such as name, address, phone number, email address, other contact details, company name, company registration number, title and education level;
- **Profile information** regarding our Academy platform; and
- **Website usage information** such as technical data, IP addresses, the URL you came from, the URL you go to, the browser utilized by you, your IP address, and your IP domain information and cookies (see clause 7 below regarding cookies).

4. When you upload personal data to the Universal Robots Academy

According to practice from the Danish Data Protection Agency, you are the sole data controller for all personal data about third parties that you upload to our website for our Academy Program. Therefore, it is your responsibility to have the required legal basis for such a processing via our Academy Program.

5. Purpose and legal basis of processing

Universal Robots collects and processes personal data for the following purposes:

- To facilitate your use of our websites, services and products
- To contact you as part of our customer relationship and to provide customer service and support



- To send newsletters or other marketing material, surveys etc.
- To pursue business leads
- Remarketing, behavioural targeting and advertising

Universal Robots will only process your personal data, if one of the following applies:

- You have given your prior consent to processing of your personal data;
- Our processing of your personal data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof;
- Our processing of your personal data is necessary to comply with any legal obligations;
- Our processing of your personal data is necessary to establish, exercise or defend any legal claims; and
- Our processing of your personal data is necessary for the purposes of the legitimate interests pursued by Universal Robots or by a third party, if such interests are not considered to override your interests or fundamental rights. Such legitimate interests may be our interests in developing, marketing and selling our products and providing our services, pursuing and maintaining our business relationship with our customers, suppliers, distributors, partners and other business relations.

6. Retention Period

The personal data Universal Robots collects shall be processed and stored for as long as required by the purpose for which the personal data has been collected.

Universal Robots may be allowed to retain your personal data for a longer period if you have given your consent to the processing activity. Furthermore, Universal Robots may be obliged to retain your personal data for a longer period, whenever required to do so for the performance of a legal obligation or to establish, exercise or defend a legal claim.

Once the retention period expires, your personal data shall be deleted.

7. Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow). These cookies enable the site to recognize your browser and, if you have a registered account, associate it with your registered account.

We use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

You can see more about how Universal Robots process cookies in our cookie-policy here:
<https://www.iubenda.com/privacy-policy/75145020/cookie-policy>

8. Recipients of personal data

We only disclose your personal data to business partners if we have received your consent thereto, if necessary to fulfill an agreement with you, if the disclosure is to comply with a legal obligation or if the disclosure is necessary for a legal claim to be determined, enforced or defended, in accordance with Article 6 (1)(a), (b), (c) or (f) of the GDPR.

We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or other's rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

Furthermore, we use the following processor:



- Webnuts A/S – Training System developers for our Universal Robots Academy.

9. Universal Robots Group

Universal Robots is part of an international organization, and the personal data we collect and process may be transferred internationally between entities in the Universal Robots Group for the purposes for which the personal data was collected.

With respect to the Universal Robots entities established in countries outside the EU/EEA that are not considered as safe third countries and therefore not ensuring an adequate level of data protection, agreements based on the EU Commission's Standard Contractual Clauses are considered the legitimate basis for the transfer of your personal data.

An overview of the Universal Robots organization and more information regarding the legitimate basis for transfer of personal data to third countries can be obtained by submitting a request for such information to dataprotection@universal-robots.com

10. Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our site. When Universal Robots provides links to such third parties, we aim to make it as clear as possible that you are leaving <https://academy.universal-robots.com/>. We have no responsibility or liability for the content and activities of these linked sites, which has separate and independent terms and conditions and privacy policies. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

11. Your rights

You may exercise the following rights regarding your personal data processed by the us:

- **Right of access:** You are entitled to have access to the personal data processed and a number of additional information. However, the right of access may not infringe other persons' rights and rights of freedom.
- **Right of rectification:** You are entitled to have incorrect personal data rectified.
- **Right of deletion:** In special situations, you are entitled to have personal data deleted before our general deletion takes place.
- **Right of restriction of processing:** In certain situations, you are entitled to have the processing of your personal data restricted. If you are entitled to such restricted processing, we may only process your personal data – except for storage – with your consent, for the purpose of establishing, exercising or defending a legal claim or to protect a person or important public interests.
- **Right of data portability:** You are entitled to data portability to the extent that our processing of your personal data is based on your consent or an agreement, and the processing takes place automatically. This right implies that you are entitled to have your personal data forwarded in a structured, generally applied and machine-readable format, which you are entitled to transfer to another service provider.
- **Right of objection:** In certain situations, you are entitled to object to our legal processing of your personal data.
- **Right of withdrawal of consent:** To the extent that our processing is based on your consent, you are entitled to withdraw your consent wholly or partly. The withdrawal of your consent will not affect the lawfulness of the processing made by us until your consent is withdrawn. Withdrawal of your consent will thus only be valid from that point in time.



For more information on your rights, see the Danish Data Protection Agency's guidelines describing the data subject's rights on <http://www.datatilsynet.dk>.

If you make use of your rights as described above, we also process personal data relating to reception and responding to inquiry. If there is doubt about your identity, we have the right to request for more information necessary to confirm your identity. In such a case, we will process and register this additional information about you for this purpose. However, we will limit the extent of information and our processing as much as possible.

12. Complaints

You can complain about our processing of your personal data to Universal Robots, see above for contact information.

If you wish to complain about our processing of your personal data, you also have the right to file a complaint with the Danish Data Protection Agency. Contact information can be found at <http://www.datatilsynet.dk>.

13. Online Privacy Policy Only

This online Privacy Policy applies only to information collected through our site and not to information collected offline.

14. Changes to our Privacy Policy

Universal Robots reserves the right to amend this Privacy Policy. The latest edition will always be available at our website, and we strongly recommend that you continually monitor and update yourself with our privacy policy applicable from time to time.

This document was last updated November, 2019.