

PRIVACY POLICY

This document sets out the privacy policy of Maytronics Limited and explains how we collect, use and more generally process your personally identifiable information in connection with your relationship with us as a customer or potential customer including:

- when you visit Maytronics' websites, including, but not limited to, <https://www.maytronics.com> (the "Sites");
- when you use the Maytronics mobile applications, including, but not limited to, the MyDolphin™, MyDolphin™ Plus, DolphinTech™, and DolphinTech™ Plus applications (the "Applications");
- when you visit or interact with us via social media platforms;
- when you register or extend your warranty or obtain services relating to your product from Maytronics or one of our third party partners;
- when you contact our customer care team or we contact you; or
- when you use, visit or interact with us via any other platform or interface.

This policy also covers where we are required to collect some personally identifiable information relating to the employees or representatives of third parties selling Maytronics products.

This policy will give you a quick and clear overview of our practices. Please take the time to read our full policy as set out below.

We receive and store the information you provide us.



Personally identifiable information is any data that could potentially be used to identify a particular individual. Different pieces of information can count as personally identifiable information if in combination they can lead to the identification of a particular person being discerned.

THE PERSONALLY IDENTIFIABLE INFORMATION THAT YOU PROVIDE US

We receive and store any information you enter on our Sites, Applications, or other platforms or interfaces, or that you give us in any other way. The personally identifiable information that we collect is more particularly described below.

Please note that you may browse our Sites as a website visitor to find out more about Maytronics, but will not be required to provide us with any personally identifiable information in this instance, unless you are otherwise notified.

The type of personally identifiable information we collect.



THE PERSONALLY IDENTIFIABLE INFORMATION THAT WE COLLECT

Visiting Maytronics' Sites

When you visit our Sites, we automatically collect and store the following information regarding all visitors; the type of browser and operating system used to access our Sites, the date and time our Sites are accessed (for the purpose of monitoring demand), and the last site that the visitor visited and if that site contained a link to our Sites (which indicates how visitor found our Sites).

Like many websites, we use "cookies" and similar technologies to identify the areas of our Sites visited. Please see our [Cookie Policy](#) for more information.

Maytronics will collect, including by using third parties' web analytics services, usage information about the time, type and manner of use of the Sites. The following information is collected: information regarding the Internet Protocol (IP) address/proxy server and Geo-IP parameters, user agent and device type and model, carrier (where

applicable), non-personal usage statistics (e.g. time of usages, number of clicks on each link, etc.), crash reports, your browsing history (for the purpose of improving the usefulness of the Sites by providing helpful links) and web activities, heat map, sessions recording, and other information regarding the use of the Sites.

Use of the Applications

The Applications may use third party tracking tools to improve the performance and features of the Applications. These third party tracking tools are designed to collect only non-personal information about the use of the Applications, but such tools are created and managed by parties outside Maytronics' control. As such, we are not responsible for any information which is actually gathered by such third parties or for the use and protection of such information by such third parties.

In addition, when you install and use the Applications, Maytronics automatically collects and stores the following information: carrier (where applicable) and the date and time any of the Applications are accessed (for the purpose of monitoring demand).

If you are using one of our connected pool robot models, we will collect your usage information and location of the robot via the Application, which in combination with other details you provide us can potentially amount to personally identifiable information.

Interactions via social media

If you choose to link your social media account(s) with us, we will also collect and store the information that you share with us relating to your social media account(s).

When you register or extend your warranty or obtain services relating to your product from Maytronics or one of our third party partners

In order to process your warranty registration or extension, or ensure that we or our partners are able to provide you with warranty or after-sales services (e.g. technical support, repairs, maintenance etc.) in relation to your Maytronics product, we and/or our partners are required to collect certain personally identifiable information from you such as contact details.

When you contact us, or when we contact you

In these contexts, we will receive and process any personally identifiable information that you provide us with in writing or orally.

If you work for or represent one of our partners (or applicant partners):

Maytronics collects and stores certain necessary personally identifiable information (e.g. professional contact details) relating to the contact employee(s) or representative(s) of distributor and reseller partners (and applicants applying to sell our products) as well as other third party business partners. These are collected and processed for the purposes of performing Maytronics' business obligations and managing its distribution network and business relationships.

How we use the personally identifiable information that we collect from you



WHAT DO WE DO WITH PERSONALLY IDENTIFIABLE INFORMATION?

We use the personally identifiable information that we collect from you to:

- manage our relationship with you (or where relevant our partners/applicant partners);
- communicate with you both generally and in response to enquiries;
- provide you with commercial and marketing information about our products and services;
- provide products and services to you on request, and to fulfil our obligations in respect of the same or assist in ensuring our partners fulfil their obligations in this regard;
- maintain and administer our Sites, Applications and other platforms and interfaces, and for internal operations (including troubleshooting, data analysis, testing, research, statistical and survey purposes);
- improve our Sites, Applications and other platforms and interfaces, to ensure that content is presented in the most effective manner for you and for your computer or device;
- ensure we keep our Sites, Applications and other platforms and interfaces safe and secure and to prevent fraud;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- make suggestions and recommendations to you and other users of our Sites, Applications and other platforms and interfaces about products that may interest you or them; and
- personalise your repeat visits to our Sites, Applications and other platforms and interfaces.

We obey the law and expect you to do the same.

If necessary, we will also use your personally identifiable information to enforce our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, legal infringements and identity thefts, and to take any action in any legal dispute and proceeding.

We will share information with our partners, service providers and affiliated entities to the extent necessary to perform our or their duties, and as necessary when we change our corporate structure.



SHARING PERSONALLY IDENTIFIABLE INFORMATION WITH OTHERS

We do not sell, rent or lease your personally identifiable information.

We will share your personally identifiable information with our service providers and other third parties such as our distributors, resellers and agents, if necessary, to fulfill the purposes for collecting the personally identifiable information, including to provide customer support and services covered by your product warranty (as applicable).

We may also share your personally identifiable information with third parties such as our distributors, resellers and agents (or their representatives) for the purposes of providing you with relevant commercial and marketing information about our products and services.

Any such third party will commit to protect your personally identifiable information as required under applicable law and this policy.

We will also share your personally identifiable information with our affiliates. This means companies within the Maytronics group and includes subsidiaries, sister-companies and

parent companies, with the express provision that their use of your personally identifiable information will comply with this policy.

Additionally, a merger, acquisition or any other structural change will require us to transfer your personally identifiable information to another entity, as part of the structural change, provided that the receiving entity will comply with this policy.

If you work for or represent one of our partners (or applicant partners):

We may share personally identifiable information relating to our partners (and applicant partners) with third parties, including our distributors. Our partners will only receive information necessary to provide their respective services and fulfil their obligations as partners and will be bound by privacy and confidentiality agreements limiting the use and disclosure of the personally identifiable information.

We will follow lawful requirements by authorities to disclose information.



DISCLOSURE OF INFORMATION TO AUTHORITIES

We may need to disclose personally identifiable information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Aggregated data is not identifiable. We use it for legitimate business purposes.



Aggregated and Analytical Information

We may use non-personal aggregated information, including such that was derived from personally identifiable information but that was anonymized or pseudonymized to remove its personally identifying characteristics ("Aggregated Information") for statistical, research and planning purposes and may retain the personally identifiable information in order to improve the overall quality of Maytronics' products and services.

We retain the right to collect and use personally identifiable information and the Aggregated Information in order to improve our Sites, the Applications, our other platforms and interfaces and our products and services in general.

We use standard analytics tools. The privacy practices of these tools are subject to their own privacy policies and they use their own cookies to provide their service (for further information about cookies, please see the 'Cookies and other tracking technologies' section in this policy).

We use Google Analytics and Hotjar and we will use additional or other analytics tools, from time to time, to learn about how users use the Sites, in support of our Site-related activities and operations. For further information about Google Analytics and Hotjar privacy practices, please read their Privacy Policies at:

<http://www.google.com/analytics/learn/privacy.html>;

<https://www.hotjar.com/legal/policies/terms-of-service>.

You can also read how Google uses data when you use Google partners' sites or apps at: www.google.com/policies/privacy/partners/. We use anonymous, statistical or aggregated information and will share it with our partners for legitimate business purposes. It has no effect on your privacy, because there is no reasonable way to extract data from such information that we or others can associate specifically to you.

We will share your personally identifiable information only subject to the terms of this policy, or subject to your prior consent.

You may opt-out of our mailing lists and terminate your use of our Sites and Applications.



YOUR CHOICE

We request and collect personally identifiable information that we need for the purposes that we describe in this policy.

At any time, you can stop using the Sites, Applications and other platforms and interfaces and we will stop collecting any further personally identifiable information from, or about you through the Sites, Applications and other platforms and interfaces. However, we will store and continue using or making available your personally identifiable information according to our data retention section in this policy. Additionally, we may continue to collect certain personally identifiable information you otherwise provide to us or one of our partners (such as for the purposes of warranty registration, services or customer support).

At any time you can exercise your following opt out options:

- You may opt out of our mailing list.
- You may request that your personally identifiable information will not be shared with our affiliates, or with our third-party providers.

Please note that it may take up to ten (10) business days for your opt-out request to take effect, and that certain opt-out requests may require us to terminate any account that you may have with us or limit your entitlements, for example, if transferring your personal details to a third-party provider is essential to provide a service such as provide warranty support.

Web browsers offer a "Do Not Track" ("DNT") signal. A DNT signal is a HTTP header field indicating your preference for tracking your activities on a service or through cross-site user tracking. Our Sites do not respond to DNT signals.

If you are a California resident, you are entitled to certain rights.



YOUR CALIFORNIA PRIVACY RIGHTS

California Consumer Privacy Act. "Personal information" has the meaning given in the California Consumer Privacy Act ("CCPA").

If the CCPA applies to your personal information collected and used by Maytronics, then the following terms apply:

- **Right to Know.** In some circumstances, you have the right to request from Maytronics the categories of personal information Maytronics has collected about you, the categories of sources from which your personal information was collected, the business or commercial purpose for collecting or selling your personal information, the categories of third parties with whom Maytronics shares your personal information, and the specific pieces of personal information Maytronics has collected

about you. You may email us at supportMT@maytronics.com with "CCPA Right to Know" in the subject line and in the body of your message to exercise this right.

- **Right to Deletion.** You have the right to request that Maytronics delete any personal information about you which Maytronics has collected from you. You may email us at supportMT@maytronics.com with "CCPA Right to Deletion" in the subject line and in the body of your message to exercise this right. There are circumstances where we are not required to comply with your request to deletion and we will let you know if one of those situations arises.

We reserve the right to verify your identity before we process any request relating to your personal information.

You may use an authorized agent to submit a request to know or a request to delete. To use an authorized agent, you must provide your agent with written authorization and we may require you to provide to us proof of your identity. We may deny a request from your agent if they do not submit proof that you have authorized them to act on your behalf. Such requirements will not apply where you have provided your authorized agent with power of attorney pursuant to Cal. Prob. Code Sections 4000 to 4465.

We will not discriminate against you if you choose to exercise any of the above rights granted to you by the CCPA. We are not discriminating against you if we deny a request to know or delete if we have a legitimate reason for the denial.

Shine the Light. If you are a California resident who provides personal data in obtaining products or services for personal, family or household use, California Civil Code Section 1798.83 ("Shine the Light Law") permits you to request in writing and obtain from us, once per calendar year, data about the customer data we shared, if any, with other third parties for their own direct marketing purposes.

If applicable, this personal data would include a list of the categories of customer data and the names and addresses of those businesses with which we shared customer data during the preceding calendar year (such as requests made in 2020 will receive data regarding 2019 sharing activities).

To make such a request, please contact us at supportMT@maytronics.com and write "Request for California Privacy Data" for the subject of your message. We will send you a reply e-mail within 30 days containing the requested data once we confirm your request.

Please note that not all of the shared data is covered by the Shine the Light Law requirements and therefore only data which is covered will be included in our response.

Consumer Rights Notice. Under California Civil Code Section 1789.3, Maytronics is required to provide California residents with the following specific consumer rights information:

- The Sites are owned and operated by Maytronics Ltd.
- Unless otherwise expressly stated, the Sites are provided without charge.
- To file a complaint regarding the Sites or to receive further information regarding use of the Sites, please contact us via email at supportMT@maytronics.com. You also may contact the Complaint Assistance Unit of the Division of Consumer Services of California's Department of Consumer Affairs in writing at 400 R Street, Suite 1080, Sacramento, California 95814 or by telephone at (916) 445-1254 or (800) 952-5210.

At any time, you can request access to your personally identifiable information.



ACCESSING YOUR PERSONALLY IDENTIFIABLE INFORMATION

If you find that the information we hold about you is not accurate, complete or up-to-date, please provide us with the necessary information to correct it.

At any time, you can contact us at: supportMT@maytronics.com and request to access the personally identifiable information that we keep about you. We will ask you to provide us with certain credentials to make sure that you are who you claim to be and will make good-faith efforts to locate your personally identifiable information that you request to access.

To the extent that you are entitled to a right of access under the applicable law, you can obtain confirmation from us of whether we are processing personally identifiable information about you, receive a copy of that data, so that you could:

- Verify its accuracy and the lawfulness of its processing;
- Request the correction, amendment or deletion of your personally identifiable information if it is inaccurate or if you believe that the processing of your personally identifiable information is in violation of applicable law.

We will use judgement and due care to redact from the data which we will make available to you, personally identifiable information related to others.

If we process your personal data when you are in the EU, further terms apply to our processing in relation to your rights as a data subject under EU data protection laws.



YOUR EU DATA SUBJECT RIGHTS

- a) For the purposes of this section, "Personal Data" has the meaning given in the General Data Protection Regulation ((EU 2016/679) ("GDPR").
- b) If EU data protection laws apply to the processing of your Personal Data by Maytronics, then the following terms apply:

Lawful bases for processing

More than one lawful basis can apply to any particular type of processing. We process your Personal Data on the following lawful bases:

Consent

We may use and process your Personal Data where you have consented for us to do so for the following purposes:

- contact you if you (i) register for an account with us online or indicate that you would like to receive marketing from us; (ii) sign up to or contact us in respect of warranty, support, repair or replacement services through the Applications, Maytronics' customer support tools (including but not limited to the Maytronics Global Interaction Center) or one of our dealers or distributors; or (iii) refresh your marketing preferences when responding to a request from us to do so;
- to provide warranty, support, repair or replacement services;
- to share your Personal Data with our third party partners (including, but not limited to, our distributors and resellers) for them to contact you with marketing information and/or to provide or assist with the provision of warranty, support, repair or replacement services; and/or
- if you work for or represent one of our partners (or applicant partners), to share Personal Data related to the employees or representatives of our partners (and applicant partners) (e.g. dealers) with our other partners (e.g. distributors) where

necessary for the purposes of implementing and/or administering our distribution arrangements, carrying out our obligations, and/or for marketing purposes.

Where there is a legitimate interest

We may use and process your Personal Data where it is necessary for us to pursue our legitimate interests as a business, or that of a third party. For example:

- to provide users with a high standard and effective application and support tools (including the Maytronics Global Interaction Center), in an attempt to enable the provision of a better and more effective customer service to the users. In order to do so, Maytronics shall create an internal profile based on the users' details;
- for marketing activities;
- to correspond or communicate with you;
- to enable us or our partners to provide supply, warranty, support, repair or replacement services;
- for network and information security purposes;
- for prevention of fraud and other criminal activities;
- to comply with a request from you in connection with the exercise of your rights;
- for the management of queries, complaints or claims;
- to enable us to verify compliance by our partners with their obligations; and for the establishment and defence of our legal rights.



Where there is a legal requirement

Maytronics may share Personal Data or any part thereof with third parties if it believes in good faith that such disclosure will either (a) facilitate compliance with any law, regulation or other governmental authority, including, for example, compliance with a court order or subpoena, or (b) protect the safety or security of any person or property, including the products and services provided by Maytronics, the Sites, the Applications and/or other platforms and interfaces. Maytronics may also disclose Personal Data or any part thereof upon a transfer or sale to another entity of all or substantially all of Maytronics' stock or assets. In such events, Maytronics will use commercially reasonable efforts to prevent such third parties from disclosing the personal data in contradiction with the terms of this Privacy Policy.

(a)

(b) Data Subject Rights

(c) In addition to your rights under other sections in this policy, you have the following rights:

- the right to be informed about the collection and the use of your Personal Data;
- the right to know whether we are processing your Personal Data and to a copy of such Personal Data;
- the right to have inaccurate Personal Data rectified, or completed if it is incomplete;
- the right to erasure (to be forgotten) in certain circumstances;
- the right to restrict processing in certain circumstances;
- the right to data portability, which allows you to obtain and reuse your Personal Data for your own purposes across different services;
- the right to object to processing of your Personal Data in certain circumstances;
- rights in relation to automated decision making and profiling;
- the right to withdraw consent at any time (where relevant); and

- the right to complain to a data protection supervisory authority of your habitual residence, place of work or of an alleged infringement of the GDPR.

A summary and further details about your rights under EU data protection laws, is available on the EU Commission's website at: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

Note that when you send us a request to exercise your rights, we will need to reasonably authenticate your identity and location. We will ask you to provide us with credentials to make sure that you are who you claim to be and will ask you further questions to understand the nature and scope of your request.

If we need to delete your personal data following your request, it will take some time until we completely delete residual copies of your personal data from our active servers and from our backup systems.

If you have any concerns about the way we process your personal data, you are welcome to contact our privacy team at: supportMT@maytronics.com. We will investigate your inquiry and make good-faith efforts to respond promptly.

Other EU Specific Terms - Transfer of Data Outside of the EU



Maytronics is based in a jurisdiction which is considered by the European Commission to be offering an adequate level of protection for the Personal Data of EU Member State residents. Our cloud hosting providers are situated in the United States, and are bound by contractual requirements to ensure proper privacy protections to individuals, regardless of any lesser requirements under US laws.

While privacy laws may vary between jurisdictions, Maytronics has taken reasonable steps to ensure that your Personal Data is treated by its affiliates and service providers in a secure and lawful manner, and in accordance with common industry practices, regardless of any lesser legal requirements that may apply in their jurisdiction.

We do not intend to collect personally identifiable information about under aged individuals. If you believe that we have collected such information, please contact us.



CHILDREN'S PRIVACY

Maytronics' Sites, Applications and other platforms and interfaces are not structured to attract or be directed to an individual who is a child or is under the minimum age allowed to use our Sites, Applications and/or other platforms and interfaces, under laws applicable to that person's jurisdiction, and we do not intentionally, or knowingly collect personally identifiable information of such users.

If you are a child or under the minimum age allowed to use Maytronics' Sites, Applications and/or other platforms and interfaces under the laws applicable in your jurisdiction, you are not allowed to use our Sites, Applications and/or other platforms and interfaces.

If we learn that we have collected personally identifiable information of said individuals, we will delete that information as quickly as possible. If you believe that we have any such information, please don't hesitate to contact us at: supportMT@maytronics.com.

We retain data to provide the service and for legitimate and lawful purposes, as further explained in the data retention section.



DATA RETENTION

We retain different types of personally identifiable information for different periods, depending on the purposes for processing the information, our legitimate business purposes as well as pursuant to legal requirements under the applicable law.

We will maintain your contact details, to help us stay in contact with you. At any time, you can contact our privacy team at: supportMT@maytronics.com and request to delete your contact details. Note that we may keep your details without using them unless necessary, and for the necessary period, for legal purposes.

We will keep aggregated non-identifiable information without limitation, and to the extent reasonable we will delete or de-identify potentially identifiable information, when we no longer need to process the information.

In any case, as long as you use our Sites, our Applications, our other platforms and interfaces and our products and services, we will keep information about you, unless the law requires us to delete it, or if we decide to remove it at our discretion, according to the terms of this policy.

We use cloud-based services to store and process data in various territories and will store them at additional site, at our discretion. These service providers provide us adequate security and confidentiality commitments.



TRANSFER OF DATA OUTSIDE YOUR TERRITORY

Your personally identifiable information is stored and processed by a data hosting service provider in the US.

We make sure that our data hosting service providers, provide us with adequate confidentiality and security commitments in respect of the storage and processing of your personally identifiable information.

If you are a resident in a jurisdiction where transfer of your personally identifiable information to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer. You can contact our privacy team at: supportMT@maytronics.com for further information about any such data transfer.

We use cookies and other tracking technologies to make it easier for you to log-in and to facilitate Service activities.



COOKIES AND OTHER TRACKING TECHNOLOGIES

We use tracking technologies, including cookies and local storage.

Cookies are small files that a web server sends to a user's device, when the user browses online.

Your device removes session cookies when you close your browser session. Persistent cookies last for longer periods. You can view the expiry date of each cookie, through your browser settings.

We use both types. We use persistent cookies to remember your log-in details and make it easier for you to log-in the next time you access our Sites. We use this type of cookies

and Session Cookies for additional purposes, to facilitate the use of the Sites' features and tools and to improve the user's experience with our Sites.

Every browser allows you to manage your cookies preferences. You can block or remove certain cookies, or all of them through your browser settings. Blocking or removing cookies will influence your user experience with our Service. For example, disabling or blocking our cookies will require you to re-enter your log-in details, or even prevent you from using features of the Sites.

Pixel tags are tiny graphics with a unique identifier (but do not retain any personally identifiable information), which help us count user or visitor visits/clicks to web pages while using the Sites. There are many browser add-ons available online, which offer online trackers blocking.

We also use browser local storage to store data on your device. Similar to cookies, browser local storage helps us store and retrieve data from HTML pages. It allows us, for example, to save the state of pages of the Sites that you have visited. When you come back and visit the Sites, or refresh the browser, the page will remain the same.

Unlike cookies, local storage objects (LSOs) are kept on your browser only and are not automatically transmitted to remote servers. You can disable storing LSOs through your browser's settings. For example, if you use Chrome, go to Settings->Privacy->Content Settings and check the box next to: "Block sites from setting any data." Please note that disabling LSOs will affect your user Site experience.

You can find more information about cookies and other online tracking technologies through the following websites: <https://www.consumer.ftc.gov/articles/0042-online-tracking>, http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm, or <http://www.whatarecookies.com>

In addition, you can find more information on how we use tracking technologies by reading the cookies section on your browser's settings. For example, if you use Chrome, go to Settings->Privacy and security->Content settings->Cookies->see All cookies and site data or contact us at: supportMT@maytronics.com.

Please see COOKIES POLICY for further information.

We implement systems, applications and procedures to secure your personally identifiable information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information.



INFORMATION SECURITY

We and our hosting services implement systems, applications and procedures to secure your personally identifiable information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information.

These measures provide sound industry standard security. However, although we make efforts to protect your privacy, we cannot guarantee that our Sites, Applications and other platforms and interfaces will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

Contact us

at: supportMT@maytronics.com or write us for every request and complaint. We will make good-faith efforts to resolve any existing or potential dispute with you.



DISPUTE RESOLUTION

We do periodical assessments of our data processing and privacy practices, to make sure that we comply with this policy, to update the policy when we believe that we need to, and to verify that we display the policy properly and in an accessible manner.

If you have any concerns about the way we process your personally identifiable information, you are welcome to contact our privacy team at: supportMT@maytronics.com, or write to us at: Maytronics International, Kibbutz Yizre'el 1935000 Israel.

We will look into your query and make good-faith efforts to resolve any existing or potential dispute with you.

We will update our policy from time to time after giving proper notice.



CHANGES TO THIS PRIVACY POLICY

From time to time, we will update this policy. Any changes we make to this policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or by way of a pop-up on our Sites, Applications and other platforms and interfaces.

Please check back frequently to see any updates or changes to our policy. By continuing to use and access our products and services and our Sites, Applications and other platforms and interfaces 30 days after such revisions are in effect, you will be deemed to accept and agree to the revisions and to abide by them. Note that if we need to adapt the policy for legal requirements, the new policy will become effective immediately or as required by law.

Please Contact us at: supportMT@maytronics.com



CONTACT US

Please contact our Privacy Team at: supportMT@maytronics.com for further information.