

## Horizon Robotics Privacy Policy

Effective Date: March, 2024.

**To download and/or print this Privacy Policy (“Privacy Policy”), click [here](#).** Prior versions of this Privacy Policy is available [here](#).

Thank you for visiting or using any website, products, online or offline service or any other place where this Privacy Policy is referenced (collectively, the “**Service(s)**”) owned or operated by Beijing Horizon Information Technology Co.,Ltd., and/or certain of its affiliates (collectively, “**Horizon Robotics**” or “**we**”). We respect your privacy and take that seriously. This Privacy Policy explains our policies and procedures regarding why, how and to what extent we collect, store, use, disclose Personal Data via our Services, including the security measures we take and choices we offer in relation to such personal information, unless, or to the extent that, a separate or supplementary privacy notice is published on Horizon Robotics’s website(s). Unless otherwise agreed by any entity Horizon Robotics with whom you have entered into the Terms of Use (if any), the Horizon Robotics entity responsible for the processing of your Personal Data is Beijing Horizon Information Technology Co., Ltd. (a company registered in the PRC with its registered address at Unit 301, 3/F, Building 2, 9 Fenghao East Road, Haidian District, Beijing).

Unless otherwise specified herein, this Privacy Policy does not apply to any products and/or services provided to you by a third party independently that are accessed through our Services, for example, such products or websites as shown to you in search results, or such other websites linked to through our Services information obtained by us offline or through any other means, including on any other website operated by any third party. **It should be noted that if you provide your Personal Data to any third party when using its products and/or services, your information shall be subject to the privacy policy or similar policies of such third party, and we will not undertake any legal liability for any third party’s improper use or disclosure of such information.**

**Please read this Privacy Policy carefully, with special attention paid to the bold parts. If you do not agree with any content hereof, please do not provide your information when requested and stop using our Services.**

We follow this Privacy Policy and applicable laws. In some jurisdictions, we might provide additional Privacy and/or Cookies Notices specific to the Services or region in the form of appendices (“**Appendices**”) adhered to this Privacy Policy. The Appendices, in conjunction with the main body of this Privacy Policy, collectively constitute the Personal Data processing rules we adhere to in your jurisdiction. Provided that the Appendices is applicable to you, in the event of any conflict or inconsistency between the terms of this Privacy Policy and the Appendices, the terms of the Appendices shall prevail; where the Appendices remain silent or ambiguous, the terms of this Privacy Policy shall govern.

This Privacy Policy will familiarize you with the following:

- I. How We Collect and Use Your Personal Data
  - II. How We Use Cookies and Similar Tracking Technologies
  - III. How We Retain Your Personal Data
  - IV. How We Share, Transfer and Publicly Disclose Your Personal Data
  - V. How We Protect Your Personal Data
  - VI. Your Rights to Your Personal Data
  - VII. How We Process/Protect Minor’s Personal Data
  - VIII. How This Privacy Policy is Updated
  - IX. Contact us
- Appendix I List of Horizon Robotics Entities
- Appendix II Special Notice Based on CCPA and CPRA

## **I. How We Collect and Use Your Personal Data**

“**Personal Data**” hereunder refers to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **1. Sources from which we collect Personal Data**

We collect Personal Data from:

- (1) information you voluntarily provide to us;
- (2) information gathered during your utilization of our Services; and
- (3) information concerning you obtained from third parties (if any), with your consent or as permitted by law.

### **2. Personal data we collect and how we use your Personal Data**

The Personal Data we collect will depend on the nature of your interaction with Horizon Robotics (for example, you may simply request information about Horizon Robotics or its Services), your chosen privacy settings and the Services you use.

As our functions and services evolve, if we introduce new features that involve data collection not mentioned in this Privacy Policy, we will inform you about the nature, extent, and purpose of this data collection through separate notices or policy revisions to seek your consent. Please note that, **if you provide the Personal Data of any third parties with us, please ensure that you have obtained the consent**

of such parties.

Generally, we collect the following categories of Personal Data, which we use for the business or commercial purposes shown below:

<b>Scenarios</b>	<b>Category of Personal Data</b>	<b>Purposes for Collection</b>	<b>Note</b>
<ul style="list-style-type: none"><li>• <b>Business Inquiry</b></li></ul>	<ul style="list-style-type: none"><li>• communications and other feedback, including questions, and other messages you address to us directly including email</li></ul>	<ul style="list-style-type: none"><li>• To communicate with you, including to respond to your comments, questions and requests</li></ul>	<ul style="list-style-type: none"><li>• You may choose to provide us with your email, other personal data and any other information in order for us to better understand and to address your needs. You are not required to provide such information compulsorily and your refusal to provide such information will not affect your use of our inquiry service.</li></ul>

### 3. Legal bases for our use of your Personal Data

We may only process your Personal Data when we have a “legal basis” to do so. We use different legal bases depending on why we process your Personal Data (in other words, the “purpose” of our processing). These legal bases are consent, legitimate interests (ours, yours or those of another party), compliance with a legal obligation, performing a task in the public interest, and protection of vital interests, specifically:

#### (1) Your Consent

We will process your Personal Data with your prior explicit consent. Subject to applicable laws and regulations, your consent must be voluntary, specific, informed and explicit. If you have given us your consent to process your Personal Data, we will only process it for the purposes specified in the Privacy Policy. You have the right to withdraw your consent, but your withdrawn consent does not affect the lawfulness of our processing of your Personal Data prior to your withdrawal. Please note that if our processing is based on your consent and you refuse or withdraw your consent, we may not be able to provide certain Services relevant to such Personal Data.

#### (2) Legitimate Interests

We process your Personal Data where this is necessary to achieve legitimate interests - whether belonging to us, you or any third party. For example, we may use information such as IP addresses, access times to improve our Services and responses to our requests to meet our legitimate interests. We may also use your email address, type of question you asked and details of your Personal Data Protection related requests in response to your requests. Under applicable laws and

regulations, these interests must not trump your interests or your fundamental rights and freedoms. You have a right to object to any disposal based on legitimate interests.

### (3) Compliance with a legal obligation

We may process your Personal Data where it is necessary to comply with a legal obligation. For example, we may use your Personal Data to prevent security incidents, to prevent malicious, deceptive, fraudulent or illegal activities and to prosecute the persons responsible for such activities. We may process your Personal Data to conduct internal audits, which is our statutory obligation under applicable laws and regulations.

## **II. How We Use Cookies and Similar Tracking Technologies**

### **1. What are cookies and similar tracking technologies?**

#### (1) Cookies

Cookies are text files containing small piece of data that are downloaded to your browser or device when you visit a certain web address, and can be recalled by a web server in the domain that placed the cookie. This data often consists of a string of numbers and letters that uniquely identifies your device, but it can contain other information as well. Some cookies are placed by third parties acting on our behalf.

Cookies can remain on your device for different periods of time. Some Cookies are “session” Cookies, meaning that they exist only while your browser or the application is open. These Cookies are deleted automatically once you close your browser or application. Other Cookies are called “persistent” Cookies. The length of time a persistent Cookie stays on your device varies from Cookie to Cookie. They can be used to recognize your device when you open and use the websites again.

#### (2) Web beacons

Some of our webpages contain electronic tags known as web beacons (such as pixel tags, clear GIFs, JavaScript, and local storage, also known as “tracking pixels”) that we use to help deliver cookies on our websites, count users who have visited those websites, and deliver co-branded products (if any). We also include web beacons or similar tracking technologies in our electronic communications to determine whether you open and act on them.

#### (3) Other similar tracking technologies

In addition to standard cookies and web beacons, our Services may also use other similar tracking technologies to store and read data files on your device. This is typically done to maintain your preferences or to improve speed and performance by storing certain files locally. But, like standard cookies, these tracking technologies can also store a unique identifier for your device, which can then track behavior.

#### (4) Third party cookies

Finally, our Services may contain standard cookies, web beacons or similar tracking technologies (collectively, “**Cookies**”) from third-party analytics providers, which help us compile aggregated statistics about the effectiveness of our promotional campaigns or other operations. These technologies enable the analytics providers to set or read their own cookies or other identifiers on your device, through which they can collect information about your use of our website and other Services, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. However, we prohibit these analytics providers from using web beacons on our sites to collect or access information that directly identifies you (such as your name or email address).

If you would like more information about the types of cookies or similar technologies we use, how we utilize them, and the methods for controlling your cookies, please click [here](#).

### **III. How We Retain Your Personal Data**

For Personal Data that we collect and process for the purposes described above, we retain such Personal Data for no longer than the period necessary to fulfil the purposes outlined in this Privacy Policy. We retain Personal Data related to commercial activities for the time period permitted by applicable law (unless you withdraw your consent at an earlier stage), and upon request we will securely delete such data in accordance with applicable law.

### **IV. How We Share, Transfer and Publicly Disclose Your Personal Data**

We may share your Personal Data as follows or as otherwise described in this Privacy Policy:

#### **1. Third parties providing services on our behalf**

We share data with our vendors, consultants, as well as third parties who perform functions on our behalf, such as hosting or operating our websites and applications, sending email, conducting data analytics, etc. We will execute stringent confidentiality agreements with any entities or individuals to whom we disclose such Personal Data requiring that the recipients to utilize Personal Data strictly for the purposes set forth in this Privacy Policy and to adopt and maintain appropriate measures to ensure the confidentiality and security of Personal Data.

#### **2. Affiliate Sharing.**

We share your Personal Data between and among Horizon Robotics and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership which are involved when we process data for the purposes listed above. We may also share your Personal Data with other Horizon Robotics entities for analytics purposes and for direct marketing purposes in accordance with

applicable law. The entities responsible for management of Personal Data shared pursuant to this section is listed [here](#).

### 3. **Business Reorganization.**

Horizon Robotics or any of its assets, including the Services, may be sold, or merger, division, dissolution, bankruptcy or other transactions. During this process, your personal information will be transferred. In this case, prior to the transfer, we will inform you of the name and contact information of the recipient and request that they process your Personal Data in a manner consistent with this Privacy Policy. The processing of your Personal Data by the recipient shall be subject to your separate consent if such processing is based on a new processing method and purpose.

### 4. **Mandatory Disclosures and Legal Protections.**

We may share Personal Data with government and law enforcement authorities and with other parties involved in, or contemplating, legal proceedings to comply with a legal obligation, when we believe in good faith that the law requires it, to verify or enforce our contract (if any) in association with this Privacy Policy or where this is necessary for us or for third parties to protect our or their rights, property, safety, or security.

## V. **How We Protect Your Personal Data**

Horizon Robotics is committed to maintaining the privacy and integrity of your Personal Data no matter where it is stored. We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction. However, the transmission of information via the internet is not completely secure.

**Although we will implement and maintain reasonable measures to protect your Personal Data, we cannot guarantee the security of the information transmitted through the Website or otherwise via the Internet; any transmission is at your own risk.**

## VI. **Your Rights to Your Personal Data**

We recognize and respect your rights concerning your Personal Data. The following outlines the rights you are entitled to under applicable laws and our commitment to safeguarding these rights:

### 1. **Notification Right**

We have established this Privacy Policy to transparently communicate how we process your Personal Data. We pledge to maintain transparency regarding the utilization of your data.

By publishing this Privacy Policy, we inform you how we process your Personal Data. We are committed to ensuring the transparency in the use of your information.

## **2. Access Right**

If you would like to request access to your Personal Data, you may query and access your Personal Data by sending an email to [privacy@horizon.cc](mailto:privacy@horizon.cc) or through contact information otherwise disclosed in this Privacy Policy to request access, and we will process and respond in time according to laws and regulations.

## **3. Rectification Right**

Should you identify inaccuracies or incompleteness in the Personal Data we hold about you, you are entitled to require us to make rectifications or additions.

You may rectify your Personal Data by sending an email to [privacy@horizon.cc](mailto:privacy@horizon.cc).

## **4. Erasure Right (Right to be Forgotten)**

If you would like to request deletion of your Personal Data, you may contact us by sending an email to [privacy@horizon.cc](mailto:privacy@horizon.cc).

## **5. Processing Restriction Right**

You have the right to require us to restrict our processing of your Personal Data, which means that we can store it, but we cannot process it any further. We will only keep the data needed to respond to your future requests. You can also contact us through the contact information disclosed in this Privacy Policy to exercise your right to restriction of processing, and we will respond in time according to laws and regulations.

You may also realize your right to restriction of processing by sending an email to [privacy@horizon.cc](mailto:privacy@horizon.cc).

## **6. Data Portability Right**

To the extent permitted by laws and regulations, you have the right to obtain your Personal Data in structured, commonly used and machine-readable formats. For example, if you decide to switch to a new service provider, this right allows you to reliably and safely move, copy or easily transfer your Personal Data between our IT system and their IT system without affecting its use.

After providing formal authorization, you may realize your right to data portability by sending an e-mail to [privacy@horizon.cc](mailto:privacy@horizon.cc).

## **7. Objection Right**

Even if the processing of your data is based on your consent, protection of legitimate interests (ours, yours or those of another party), protection of our legitimate interests, or compliance with a legal obligation, you have the right to object the processing of your Personal Data by us.

You may realize your right to object by sending an e-mail to [privacy@horizon.cc](mailto:privacy@horizon.cc).

## **8. Consent Withdraw Right**

You may change your consent by sending an email to [privacy@horizon.cc](mailto:privacy@horizon.cc).

Should you choose to withdraw your consent, we will cease processing the pertinent

Personal Data. However, your decision to withdraw your consent will not affect the previous Personal Data processing activities based on your authorization consent.

#### **9. Complaint Right**

You are entitled to raise concerns or lodge complaints with us using the contact details provided in this Privacy Policy.

## **VII. How We Process/Protect Minor's Personal Data**

Horizon Robotics does not intentionally or knowingly collect Personal Data from minors without proper consent from a parent or legal guardian. If you believe that we may have collected Personal Data from a minor without the requisite consent, please let us know using the methods described at the section **Contact Us** and we will investigate and promptly address the issue. For these purposes, we define a “**minor**” to mean an individual who is under the age of majority in the territory in which they are resident.

## **VIII. How This Privacy Policy Is Updated**

We recognize that information privacy is an ongoing responsibility, and so we will update this Privacy Policy from time to time as we undertake new Personal Data practices or adopt new privacy policies. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access our Website to stay informed about our privacy practices.

## **IX. Contact Us**

You have legal rights in relation to the Personal Data we hold about you (to the extent permitted under applicable laws and regulations). You may request access or corrections to the data we process about you. You may opt out of receiving marketing messages from Horizon Robotics by following the instructions in those messages. If you opt out, we may still send you non-marketing emails, such as those about our ongoing business relations.

If you have questions or concerns about this Privacy Policy, or to exercise any of your rights and choices as described herein, please contact us by using the email or send a letter to our Data Protection Officer (or department responsible for the protection of Personal Data) to the mailing address below. Normally, we will respond within 15 business days or the time period otherwise permitted by the applicable laws.

Horizon Robotics



Email: [privacy@horizon.cc](mailto:privacy@horizon.cc).

ATTN: Data compliance committee

Unit No. 1, 3rd Floor, Building No. 2,

Fenghao East Road No.9, Haidian District, Beijing, China

#### Appendix I List of Entiti(es)

Horizon Robotics entity	Address
Beijing Horizon Information Technology Co.,Ltd.	Unit No. 1, 3rd Floor, Building No. 2, Fenghao East Road No.9, Haidian District, Beijing, China

#### Appendix II Special Notice on California Privacy Rights and Additional Information

Effective Date: March ,2024

**To download and/or print this Special Notice on California Privacy Rights and Additional Information (“Special Notice”), click [here](#).**

As supplementary terms to the *Horizon Robotics Privacy Policy*, the Special Notice constitutes an integral part of the *Horizon Robotics Privacy Policy* and is applicable to residents in the State of California who visit and use Horizon Robotics Services (hereinafter referred to as “**California residents**” or “**You**”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”), as amended by the 2020 California Privacy Rights Act (“**CPRA**”), and its implementing regulations, collectively referred to as “**CCPA & CPRA**”.

The Special Notice will explain to you:

1. *The categories and sources of your Personal Data we collected in the past 12 months*
2. *The purpose of our collection of your Personal Data*
3. *The situation of our sharing of your Personal Data for business purposes in the past 12 months*

4. *No sale of Personal Data*
5. *Your rights under the CCPA & CPRA*
6. *The principle of non-discrimination*
7. *California Shine The Light Disclosure*

**The “Personal Data” mentioned herein refers to the information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.** Please read this Special Notice carefully to understand our practices on customer’s Personal Data and privacy protection before using our Services or providing Personal Data to us.

### **1. The categories and sources of your Personal Data we collected in the past 12 months**

You have the right to know the categories of Personal Data we may collect from you and the specific purpose for which we collect it. Your Personal Data we collected in the past 12 months and its sources are as below:

#### **(1) Personal Data you may provide to us, including:**

- Identifiers, such as e-mail address and IP address.
- Communications and other feedback, including questions, and other messages you address to us directly including email

#### **(2) Personal Data we may collect during your use of Horizon Robotics Services, including:**

- Internet or other electronic network activity information: including information about your use of our Services, Internet Protocol (IP) address, URL of the service accessed, and the date of access to the Service and the information browsed.

### **2. The purpose of our collection of your Personal Data**

Your Personal Data collected by us is mainly used:

- **To enable you to give feedback and make business enquiries to us:** We will reach you and inform you of our responses to your business enquiries according to your Personal Data (i.e. your e-mail address and your questions, and other messages related to our Service you address to us) provided by you and collected by us.
- **To respond to law enforcement requests according to applicable laws, court orders or government regulations.**

**Without your consent, we will not collect any Personal Data other than those as disclosed herein, or use the Personal Data collected by us for any purposes other than those as mentioned above.**

### **3. The situation of our sharing of your Personal Data for business purposes in the past 12 months**

You have the right to know whether your Personal Data is shared with any third party.

We may disclose your Personal Data to third parties for business purpose. We will enter into agreements with such third parties for the realization of such business purposes, requiring them to undertake confidentiality obligations in respect of the Personal Data we disclose to them, and not to use the Personal Data for any purpose other than those stipulated herein. In the preceding 12 months, we have not disclosed your Personal Data for any business purpose.

#### **4. No sale of Personal Data**

You have the right to know whether your Personal Data is sold or not. As defined in CCPA & CPRA, “sell,” “selling,” “sale,” or “sold,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s Personal Data by the business to another business or a third party for monetary or other valuable consideration.

**We do not sell Personal Data. None of your Personal Data has been sold by us in the past 12 months.**

#### **5. Your rights under the CCPA & CPRA**

##### **(1) Your rights**

**According to the provisions of the CCPA & CPRA, you are entitled to the following rights:**

- Right to know/access: To understand the situation of our collection and using of your Personal Data in the past 12 months.
- Right of data portability: To obtain a copy of your Personal Data.
- Right to request deletion: To erase/delete your Personal Data.
- **Right to opt-out of the sale of Personal Data: we do not provide opt-out mechanism as we do not sell your Personal Data.**

##### **(2) Method to request rights**

You can exercise your rights through the following method. Once we receive and verify your request, we will respond according to the requirements of CCPA & CPRA:

Horizon Robotics

Email: [privacy@horizon.cc](mailto:privacy@horizon.cc).

ATTN: Data compliance committee

Unit No. 1, 3rd Floor, Building No. 2,

Fenghao East Road No.9, Haidian District, Beijing, China

##### **(3) Exercise of Your Rights**

Please be aware that only you or a person registered with the California Secretary of State that authorized by you to act on your behalf may make a verifiable request relating to your Personal Data. You may also make a verifiable request on behalf of your minor children.

**Please be noted that according to the CCPA & CPRA, we are not obligated to respond to request for access or data portability of the same consumer more than twice in a 12-month period.**

**We may deny your deletion request if it is necessary for us or our service providers to retain your information based on the following circumstances:**

- **To complete a transaction to collect Personal Data, perform a written warranty or product recall term under the federal law, provide the Services you require or reasonably expect in our ongoing business relationship with you, or perform a contract between us and you.**
- **To detect security incidents against malicious, deceptive, fraudulent or illegal activities; or prosecute those responsible for such activities.**
- **To debug products to identify and repair errors that impair existing intended functionality.**
- **To exercise freedom of speech, safeguard another consumer's right to exercise the right to freedom of speech, or to exercise another right prescribed by law.**
- **To abide by *California Electronic Communications Privacy Act* in accordance with Chapter 3.6 of Title 12 of Part 2 of the *California Penal Code* (commencing with Section §1546).**
- **If you have provided your informed consent to engage in public or peer-reviewed scientific, historical or statistical research that complies with all other applicable ethical and privacy laws in the public interest, and the erasure/deletion of information may result in the inability or serious impairment of the results of such research.**
- **To only allow internal use based on our relationship with you and such internal use is reasonably consistent with your expectations.**
- **To comply with the obligations as stipulated by law.**
- **To use your Personal Data internally in a legal manner appropriate to the environment in which you provide the information.**

#### **(4) Respond to your request**

Before responding to your request, we may need to verify your identity and authenticity of request. A verifiable consumer request shall:

- **Provide sufficient information to enable us to reasonably verify that you are the person or authorized representative whose Personal Data we collect.**
- **Describe your request in detail so that we can understand, evaluate and respond correctly.**

**If we are unable to verify your identity or access to make a request and confirm that the Personal Data is relevant to you, we will not be able to respond to your request or provide you with Personal Data.**

**We will respond to your request within 45 days after receiving your verifiable request. If we need more time (up to 90 days), we will inform you in writing of the reason and extension period.**

**Responded information provided by us will only cover 12 months prior to the receipt of verifiable requests. If we decide to reject your request, the reply we provide will explain the reason of our rejection. For your request to the right of data portability, we will choose a format to provide easy-to-use Personal Data and allow you to transfer the information from one entity to another without difficulties.**

**We will not charge to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that a fee can be charged in response to your request, we will inform you of the reason for the charge and provide you with an estimated amount before replying to your request.**

#### **6. The principle of non-discrimination**

We will not discriminate against you because you exercise the rights granted to you by the CCPA & CPRA. Unless otherwise specified in the CCPA & CPRA, we will not:

- (1) Refuse to provide you with Services;
- (2) Charge you different prices or fees for Services;
- (3) Provide you with Services of different levels or quality; or
- (4) Take other discriminatory measures.

#### **7. California “Shine the Light” Disclosure**

We will not disclose your Personal Data to third parties for their direct marketing of our Services to you.