DATA SECURITY POLICY

1. INTRODUCTION

Thank you for using our Products brought to you by Gausium, a brand of Shanghai Gaussian Automation Technology Development CO., LTD ("we", "us" or "our"). This security policy ("Security Policy") provides you with information on the data security and data protection of our products and users. In this Security Policy, when we refer to "you" and "your" we mean you, the person using our product.

This Security Policy governs the personal data about our customers which Gausium collects and uses. We are responsible for the use and disclosure of such personal data in accordance with the Data Protection Act 2018 incorporating the General Data Protection Regulation (GDPR) which currently applies across the European Union. By using our Products, you consent to our processing of your personal data in accordance with this Security Policy.

2. ABOUT US

We are Gausium, a brand of Shanghai Gaussian Automation Technology Development CO., LTD, a company incorporated in China with Tax ID 91310115080028627C and have our registered office at Floor 10, building D, Shengxia Road No.666, China (Shanghai) Pilot free trade zone, Shanghai city, China.

If you have any queries about this Security Policy, or would like to contact us for any reason, please do so using the following details:

> Address: Floor 10, building D, Shengxia Road No.666, China (Shanghai) Pilot free trade zone, Shanghai city, China
>
> Email: support@gausium.com

3. DATA PROTECTION AND SECURITY

Gausium's Data Protection Procedure and System ensures that our Robots and Users are secured through cyber defense and data protection. Gausium will conduct to mitigate compliance risks in the following ways:

- Gausium Employee Manual-Information and Cyber Security Aspects

  The manual states employee's information security responsibilities and the requirements.

- Gausium APP, robot's software development procedure

  Gausium applies security measures in every phase of development and follows a rigorous design, development, review, testing process to deliver all our products.

- Gausium Cloud release procedure

  Gausium applies security measures in every phase of development and follows a rigorous design,development, review, testing process to deliver all our products.

- Gausium Cloud Maintenance Manual- Information and Cyber Security Aspects

  Gausium internal cloud maintenance manual regarding to secure response.

3.1 PROTECTION AND SECURITY OF GAUSIUM CLOUD

The data is saved in the Gausium Cloud which is a SaaS-based delivery platform hosted in Amazon Web Services Cloud. The servers are in the below listed locations and when the user logs in, user can choose any server from the below list to store their personal data. The server is centralized and controlled by Amazon.

Server Locations:

1. China

2. US East

3. US West

4. Asia Pacific (Tokyo)

5. Asian Pacific (Singapore)

6. EU (Frankfurt in Germany)

7. United Kingdom (London)

Gausium centralized Cloud system operates with latest technologies in embedded communication system. Gausium Cloud Platform is an individual software platform provided by Gausium, used for management, operation, and maintenance for cleaning robotics system.

Gausium's coping strategy to Information & cyber-Security threats include Safety Features such as Gausium Cloud Firewall, Gausium Office Firewall and Gausium Office Security Group. The Implemented Safety Measures are the following:

- HTTPS Secure Data Transmission

    Widely used for security-sensitive communications on the World Wide Web, such as transactions and payments.

- SSO

    Single Sign On, with which users only need to log in once and can access multiple Gausiumplatforms.

- Gausium Cloud authorization and authentication system

    Identify the user and provide different functions according to the user level.

- Encrypted Core Data

    SHA-256 for the user information.

- Cloud-to-Robot bidirectional authentication

    Token based bidirectional authentication to ensure the security of both Cloud and Robot.

- Third Party Connection bidirectional authentication

    Token based bidirectional authentication to ensure the security of both the Cloud and the third partywhen using OpenAPI.

Gausium Cloud Platform handles Security Check and Verification as listed below.

- Gausium static security examining (static security analysis including APP code, Robot code and Cloud code）

- Gausium Cloud periodical security test Monthly basis）

- Gausium Cloud release security test （Developments- regression testing-security test）

- APP installation package test

- Penetration Test

All customers receive their own tenant of the Gausium Robot Fleet Management Platform. The Gausium Fleet Management Platform is a multi-tenant client-server application where all customers receive their own instance. Tenants are logically separated to prevent unauthorized access to client data.

The Gausium Cloud Platform, which helps companies manage Cleaning Robots, includes a web-based and Mobile APP for tracking and controlling all Robots. Customers can create their own Users which are able to manage robot information, task reports and statistics, task management, etc. From Mobile APP, the authorized user can start or stop a cleaning task remotely. Outputs include cleaning task reports inclusive area coverage, performance, Cleaners Performance etc. The task reports are sent to a server, which is accessible by main-web browser on internet, the server is centralized and controlled by Amazon.

Our solution gathers the following types of customer data:

- Usernames and email addresses

- Building Information and maps

- Robot task activities

Best practices are in place to encrypt Data. Personal Data are masked. Gausium applies token-based user ID Authentication and Authorization. Map schematics are encrypted and stored in Cloud and are accessible only by Authorized User group.

3.2 PROTECTION AND SECURITY OF PERSONAL DATA OF USERS

Gausium respects your privacy and is committed to protecting your personal data. In this Security Policy, "personal data" means data, whether true or not, about an individual who can be identified: (a) from that data, or (b) from that data and other information to which we have or are likely to have access.

Personal Data and Business Data are separated. Personal Data, including username, mobile phone number, Email address, login information including passwords, etc., are encrypted and stored in servers listed in Section 3.1.

The Gausium Cloud Platform collects and stores data regarding customers' basic information for authorization and Robot's activity logs generated from daily operations.

Data Field	Category	Required by Product	Security Method
Email Address	PII*	Yes	Encrypted
Login Data	Personal Data	Yes	Encrypted
Mobile Number	PII*	Optional	Encrypted

*PII = Personally Identifiable Information

We secure the personal information at the earliest design stage. The above collected data are Encrypted Data At-Rest and In-Transit and are stored Local to Region and are non-transferable to overseas. The access to the collected data requires Authentication and Authorized User Access. Ex: to use for Internal and Auditing purposes.

Gausium only collects client data on a "need to have" basis and does not monetize or seek any gain from harvesting or processing any of the client data listed above. In addition, if you wish to delete your personal data stored in the server (excluding the username in task reports), the user can use the "Destroy account" button to delete all the personal data.

3.3 DATA MAINTENANCE SECURITY

Gausium provides multiple measures to ensure data maintenance security:
- Data Storage Security： Off-line Data backup
- Production Database Account Management System
- Privilege-separated System of Production Database

4. TECHNICAL SECURITY OF THE GAUSIUM ROBOTS

The Gausium is equipped with 4 types of sensors.

- **LIDAR**
  The 3D/2D LIDARs provide distance measurements to objects or features and They are the main sensor to create the SLAM map and localize the robot during navigation. The LIDAR does not work with glass and performs poorly with reflective surfaces and black surfaces. No personal data is recorded and there are no possible hazards to people from the LIDAR.

- **Ultrasonic radar**
  The Ultrasonic radars supplement the LIDARs by measuring distance to obstacles close to the body of the robot to assist obstacle avoidance. No personal data is recorded. Gausium has cancelled SONAR sensors in latest robots.

- **CAMERA**
  The camera modules also supplement the LIDARs in helping the Robots gauge the distances to objects in front of it. It is consisted of depth cameras and RGB camera. The captured depth data is processed in real-time and not stored. All the Gausium robots in European market have disabled the RGB camera and will never capture, store, or transmit real images.

- **Millimeter Wave Radar**
  The millimeter wave Radar is equipped on some of Gausium robots. With the ability to measure the distance, velocity, and azimuth of multiple targets at the same time, the robot can achieve better and safer performance in environments with vehicles moving around, such as parking lots and some warehouses. No personal data is recorded.