

iRobot HR Privacy Policy

Applicability: Global (all Locations)	Authorized by: Human Resources	Effective Date: 25-May-2018
---	--	---------------------------------------

1. OUR APPROACH TO PRIVACY

- 1.1 iRobot is committed to protecting and respecting the privacy of our employees, directors, agency workers, interns, consultants, applicants and contractors who are engaged by us ("**Employees**", "**you**"). This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you ("**personal information**").
- 1.2 Please ensure that you have read and understood how we collect, store, use and disclose your personal information as described in this privacy policy.

2. DATA CONTROLLER

- 2.1 A list of iRobot companies that this policy applies to can be found at **Annex 1**. Your employer will be the data controller of your personal information, and references to "**iRobot**", "**we**" or "**us**" in this policy are references to that company.

If you are unsure which iRobot company is the data controller of your personal information, please contact hr@irobot.com.

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

- 3.1 We collect personal information that you voluntarily submit directly to us, such as when you submit your application to us, communicate with us in respect of your employment or when you fill in certain forms at the start of your employment. This can include your name, ethnicity, address, emergency contacts, education and qualification details, and salary and benefits details.
- 3.2 When we collect such information from you, we will inform you if the information is mandatory or optional. If you do not provide any information which is marked as mandatory, we may be unable to perform some of our obligations to you.
- 3.3 We may collect personal information about you from other parties, such as information provided by recruiters, executive search firms, referees and the results of any background checks against public or government databases.

The Senior Function Leader of the "authorized by" function administers, interprets & amends this policy.

iRobot HR Privacy Policy

- 3.4 We may also create and maintain internal records which may contain personal information about you, such as application or interview evaluation notes.

The table in **Annex 2** sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information.

4. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

- 4.1 We will store the personal information we collect about you for no longer than necessary for the purposes set out in Annex 2 and in accordance with our legal obligations and legitimate business interests.
- 4.2 In all cases, data held by us will only be used consistent with the relevant and applicable legal requirements of the country in which the personal information is collected.

5. RECIPIENTS OF PERSONAL INFORMATION

- 5.1 We may share your personal information with the following (as required in accordance with the uses set out in Annex 2):
- (a) **Other iRobot companies:** personal information may be transferred to our parent company, iRobot Corporation, and other iRobot companies in connection with:
 - (i) the provision of centralized human resources management;
 - (ii) group business planning, budgeting, accounting, reporting and strategy;
 - (iii) group-level legal and regulatory compliance and managing associated risks, providing legal advice and in connection with potential or actual litigation;
 - (iv) providing and administering whistleblowing schemes within the iRobot group;
 - (v) reporting, assessing and responding to claims for risk management.
 - (b) **Service providers and advisors:** we may share your personal information with third party vendors and other service providers that perform services for us or on our behalf, which may include providing mailing or email services, tax and accounting services, payments processing. Such data may be disclosed in connection with:
 - (i) the provision of centralized human resources management;
 - (ii) the provision of centralized IT infrastructure;
 - (iii) the provision of benefits administration;
 - (iv) centralized processing of salary and benefits payments;

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

- (v) obtaining professional services such as legal and accountancy services on behalf of the entire group.
- (c) **Purchasers and third parties in connection with a business transaction:** your personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business.
- (d) **Third parties at your request:** we may disclose your personal information where you ask us to, such as banks or mortgage providers, or other employers if you ask us for a reference from us when you apply for another position.
- (e) **Third parties, as necessary in connection with your job role:** we may disclose certain personal information, such as your name and contact details, to third parties who may need to contact you in connection with your role within iRobot.
- (f) **Law enforcement, regulators and other parties for legal reasons:** we may share your personal information with third parties as required by law or if we reasonably believe that such action is necessary to (i) comply with the law and the reasonable requests of law enforcement; (ii) detect and investigate illegal activities and breaches of agreements; and/or (iii) exercise or protect the rights, property, or personal safety of iRobot, our Employees or others.

6. CONSENT

- 6.1 In accordance with applicable law in your jurisdiction, we may need your consent for some uses of certain personal information. For instance, in certain circumstances, we may need your consent to use certain "sensitive" information, such as information about your health or ethnicity, in particular ways.
- 6.2 If we need your consent, we will notify you of the personal information we intend to use and how we intend to use it.
- 6.3 You do not have to give us consent. Where you have given us consent to collect, use or disclose your personal information in a certain way, you may withdraw your consent at any time. If you wish to withdraw any consent that you have given us, please contact us using the details below.

7. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

- 7.1 **Security.** We implement appropriate technical and organizational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on secure servers.

The Senior Function Leader of the "authorized by" function administers, interprets & amends this policy.

iRobot HR Privacy Policy

7.2 **International Transfers of your Personal Information.** The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third party service providers have operations. For example, if you are located in the European Union ("EU"), your personal information may be processed outside of the EU including in the United States. These international transfers of your personal information will be made pursuant to an intra-group data transfer agreement between all of the iRobot entities, which contains standard contractual clauses adopted by the European Commission for the transfer of personal information. If you wish to enquire further about these safeguards used, please contact us using the details set out at the end of this privacy policy.

8. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

8.1 In accordance with applicable privacy law, you have the following rights in respect of your personal information that we hold:

- (a) **Right of access.** You have the right to obtain:
 - (i) confirmation of whether, and where, we are processing your personal information;
 - (ii) information about the categories of personal information we are processing, the purposes for which we process your personal information and information as to how we determine applicable retention periods;
 - (iii) information about the categories of recipients with whom we may share your personal information; and
 - (iv) a copy of the personal information we hold about you.
- (b) **Right of portability.** You have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal information to another person.
- (c) **Right to rectification.** You have the right to obtain rectification of any inaccurate or incomplete personal information we hold about you without undue delay.
- (d) **Right to erasure.** You have the right, in some circumstances, to require us to erase your personal information without undue delay if the continued processing of that personal information is not justified.
- (e) **Right to restriction.** You have the right, in some circumstances, to require us to limit the purposes for which we process your personal information if the continued processing of the personal information in this way is not justified, such as where the accuracy of the personal information is contested by you.

The Senior Function Leader of the "authorized by" function administers, interprets & amends this policy.

iRobot HR Privacy Policy

- (f) **Right to object.** You have a right, in some circumstances, to object to any processing based on our legitimate interests. There may, however, be compelling reasons for continuing to process your personal information, and we will assess and inform you if that is the case.

8.2 If you wish to exercise one of these rights, please contact hr@irobot.com.

8.3 If you reside in the EU, you also have the right to lodge a complaint to the supervisory authority in your country of residence. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

9. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the "last modified" date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

10. CONTACTING US

10.1 Please contact hr@irobot.com if you have any questions, comments and requests regarding this Privacy Policy. You can also contact our Data Protection Officer at irobot-dpo@mazars.co.uk.

10.2 This privacy policy was last modified on May 25, 2018.

The Senior Function Leader of the "authorized by" function administers, interprets & amends this policy.

iRobot HR Privacy Policy

ANNEX 1 – IROBOT ENTITIES THIS POLICY APPLIES TO

- iRobot Corporation
- iRobot Securities Corp.
- iRobot US Holdings, LLC
- iRobot Holdings LLC
- iRobot UK Ltd
- iRobot France SAS
- iRobot Belgium SPRL
- iRobot Germany GmbH
- iRobot Portugal Unipessoal Lda
- iRobot Netherlands B.V.
- iRobot Austria GmbH
- iRobot Iberia SL
- iRobot (HK) Limited
- iRobot (Shanghai) Ltd.
- iRobot Japan G.K.
- Guangzhou iRobot Robot Technology Consulting Company Limited

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

ANNEX 2 – PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for the processing
Identity and contact details , such as your name, phone number, address, e-mail address, gender and date of birth.	We use this information to open and maintain human resources records.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.
	We use this information to communicate with Employees for internal business purposes or emergencies.	The processing is necessary for our legitimate interests, namely communicating with Employees.
	We use this information to issue payslips, process payroll and to enroll you in and facilitate benefit programs.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
	We use this information to grant you access to internal computer systems.	The processing is necessary for our legitimate interests, namely providing Employees access to company resources.
Nationality, citizenship and right to work information , such as country of birth, government identification documents (including passports and residency permits) and, where relevant, visa information.	We use this information to determine your eligibility to work.	The processing is necessary for compliance with a legal obligation to which we are subject.
	We use this information to fulfill our obligations to relevant government authorities.	The processing is necessary for compliance with a legal obligation to which we are subject.
Current job role information , such as position held, job description, responsibilities and assignments, years of service.	We use this information to maintain human resources records.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.
	We use this information to allocate resources.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

	We use this information to assess, forecast and make business decisions about our human resources.	The processing is necessary for our legitimate interests, namely managing our resources.
	We use this information to determine the tasks and responsibilities assigned to you.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
Job application information , such as position applied for, previous roles, job description, responsibilities and assignments, years of service, qualifications and experience, and other information contained in your CV.	We use this information to process job applications, including assessing potential Employees' suitability, for a role you have applied for and future roles you express an interest in.	The processing is necessary for our legitimate interests, namely managing and processing applications for positions with iRobot.
	We use this information to calculate proposed salary and assessing eligibility for certain benefits.	The processing is necessary in order to take steps prior to entering into a contract with you.
Recruitment information , such as comments and notes made by interviewers or other Employees in connection with your application.	We use this information to monitor and allocate human resources.	The processing is necessary for our legitimate interests, namely managing our human resources.
Benefits information , such as salary details, bonus payments, pension details, medical insurance, share scheme details.	We use this information to maintain human resources records.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.
	We use this information to allocate resources.	The processing is necessary for our legitimate interests, namely managing our human resources and maintaining company records.
	We use this information to assess, forecast and make business decisions in relation to financial and other obligations to Employees and third parties (such as tax authorities and beneficiaries) in relation to any benefits owed to Employees.	The processing is necessary for our legitimate interests, namely managing our resources.

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

	We use this information to process payroll.	The processing is necessary for the performance of a contract.
Payment information , such as your credit card or bank account details.	We use this information to pay salaries and other benefits to Employees.	The processing is necessary for the performance of a contract.
	We use this information to process expenses claims.	The processing is necessary for the performance of a contract.
Details of partners, dependents, beneficiaries.	We use this information to process benefits (including governmental tax and social benefits) to which Employees' partners, dependents or other beneficiaries may be entitled.	The processing is necessary for the performance of a contract.
Next of kin	We use this information to contact the designated contacts in the case of an emergency.	The processing is necessary for compliance with a legal obligation to which we are subject.
Results of reference checks and screening , such as verification of education and employment history.	We use this information to process job applications, including assessing your suitability for a role.	The processing is necessary in order to take steps prior to entering into a contract with you.
	We use this information to fulfill our obligations under applicable law, regulations, legal processes or enforceable government requests.	The processing is necessary for compliance with a legal obligation to which we are subject.
Results of background checks , such as criminal records checks and other searches relevant to the role for which you are applying.	We use this information to verify your suitability for a role, where the nature of the role requires additional background checks (e.g. disqualification as a director or driving licence checks).	We will only process this personal data to the extent that you have given us your explicit consent to do so.
Performance and development records , such as training records, records of courses and training undertaken, performance reviews and assessments.	We use this information to conduct performance appraisals and to assist with career planning and skills monitoring.	The processing is necessary for our legitimate interests, namely managing our human resources and fulfilling our professional and contractual obligations to third parties.

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

	We use this information to assess suitability for, and to process promotions, job moves and staff restructuring.	The processing is necessary for our legitimate interests, namely managing our human resources and monitoring the qualifications and experience of our staff.
	We use this information to provide references for future applications.	The processing is necessary for your legitimate interests, namely in connection with your application to a new position.
	We use this information to fulfill our regulatory obligations, including demonstrating compliance with regulatory and professional requirements in relation to compliance, training and qualifications.	The processing is necessary for our legitimate interests, namely fulfilling our professional and contractual obligations to third parties.
Disciplinary, capability and conduct records , such as details of warnings and other records relating to conduct.	We use this information to assess and take action in relation to disciplinary, capability, grievance and conduct issues.	The processing is necessary for the performance of a contract.
	We use this information to maintain employment records, monitor and improve our human resources procedures and processes.	The processing is necessary for our legitimate interests, namely managing our human resources, and ensuring compliance with internal policies and procedures.
	We use this information to comply with legal obligations to which we may be subject.	The processing is necessary to comply with a legal obligation to which we are subject.
	We use this information to comply with any professional obligations to which we may be subject.	The processing is necessary for our legitimate interests, namely compliance with our professional obligations.
	We use this information to monitor absence and sickness, to make corresponding decisions relating to	The processing is necessary for our legitimate interests, namely managing our human resources

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

Absence records. Records relating to time away from the office, including holiday, illness and paternity/maternity leave.	human resource allocation, and to address any other issues that may arise from absences.	and ensuring compliance with internal policies and procedures.
	We use this information to meet statutory requirements with regards to absences.	The processing is necessary for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorized by EU or Member State law.
Health and safety records, including information relating to health and safety in the work place, accidents and near misses.	We use this information to address legal obligations to Employees in relation to health and safety in the work place.	The processing is necessary for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorized by EU or Member State law.
Professional and trade union memberships, such as membership of professional bodies, consultation bodies, including works councils and trade unions.	We use this information to perform our legal obligations in relation to trade unions.	The processing is necessary for carrying out obligations and exercising specific rights in the field of employment insofar as it is authorized by EU or Member State law.
	We use this information to perform our professional obligations in relation to professional or trade memberships.	The processing is necessary for our legitimate interests, namely fulfilling our professional obligations.
Equal opportunities monitoring information, such as information relating to your ethnicity.	We may anonymise and aggregate this information to monitor and improve our human resources policies and procedures and diversity in the workplace.	We will only process this personal information to the extent that you have given us your explicit consent to do so.
	We use this information for reporting as required by law.	The process is necessary for our legitimate interests, namely required regulatory reporting in certain jurisdictions.
Any other data provided by the Employee that is stored on employer's equipment and computer systems, including electronic communications,	We use this information to monitor compliance with internal rules and policies.	The processing is necessary for our legitimate interests, namely enforcing compliance with our policies.

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.

iRobot HR Privacy Policy

<p>information relating to use of the computer systems, documents stored on company hardware.</p>	<p>We use this information to investigate security breaches and misuse of computer equipment and systems, and to maintain and back-up records in accordance with back-up and disaster recovery plans.</p>	<p>The processing is necessary for our legitimate interests, namely providing internal computer systems and hardware, and ensuring the security and integrity of those systems.</p>
<p>Data collected through monitoring of Employee communications and use of employer equipment, such as registration and login times and dates, software used, account status and other equipment use metrics.</p>	<p>We use this information to monitor compliance with internal rules and policies.</p>	<p>The processing is necessary for our legitimate interests, namely monitoring and enforcing our rights.</p>
	<p>We use this information to investigate security breaches and misuse of computer equipment and systems.</p>	<p>The processing is necessary for our legitimate interests, namely providing internal computer systems and hardware, and ensuring the security and integrity of those systems.</p>

The Senior Function Leader of the “authorized by” function administers, interprets & amends this policy.