



Product Privacy Policy

R-Zero Systems, Inc., its subsidiaries and affiliates (hereinafter “R-Zero,” “us,” “our,” or “we”), respect your privacy and are committed to protecting it consistent with this policy (“Privacy Policy”).

This Privacy Policy sets forth the types of Personal Information we may collect and process through the use of R-Zero’s products and services, including, but not limited to, Arc, Beam, and Vive (collectively, the “Products”), and provides transparency about our privacy practices, including how we use and disclose Personal Information, and how you may exercise your applicable privacy rights.

The privacy rights available to you may vary based on your individual circumstances and the laws applicable to you. By using our Products, you consent to our use of your Personal Information as set forth in this Privacy Policy.

Scope of This Privacy Policy

This Privacy Policy applies to Personal Information collected and processed by and through your access to and use of R-Zero’s Products for users located in the United States and Canada. It does not apply to any other R-Zero services or dealings with us by or through any other means.

This Privacy Policy is effective as of the “Last Modified” date found at the bottom of the page. We may revise this Privacy Policy at any time in our sole discretion (see “Changes to Privacy Policy” below). By continuing to use the Products, you are consenting to any such revisions and should therefore periodically review the then-current version of this Privacy Policy. We will not use Personal Information for a purpose different from that which it was originally obtained without providing you notice.

Use by Minors

We do not knowingly collect information from minors. If you are a minor, do not use our Products or provide any information us. If we learn that we have collected or received information from a minor without verification of parental consent, we will delete that information. If you believe we might have inadvertently collected information from or about a minor, please contact us at support@rzerosystems.com.

Personal Information You Provide to Us (“Provided Information”)

We collect Provided Information within the course of accessing and using of our Products.

Provided Information we collect may include the following categories of information:

Contact Information	Name (first and last), company, role, title, phone number, e-mail, mailing address, and the object of any communications.
Account IDs	ID creations and IDs (e.g., usernames and password), and authentication methods associated with your R-Zero Product accounts.



Support Information	The object of any support requests and messages.
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We use Provided Information in the following ways:

- Providing the Products and support;
- Operating our business and administering customer accounts;
- Communicating through email and other means;
- Detecting and preventing abuse and security threats;
- Complying with legal and regulatory obligations;
- Providing you with information that you request from us;
- Fulfilling any other purpose for which you have provided us with your information;
- Notifying you about changes to the Products, our Terms of Use, or this Privacy Policy;
- In any other way we may describe when you provide the information; and
- For any other purpose to which you consent.

Personal Information We Collect Automatically (“Usage Information”)

User actions and device events within R-Zero’s Product Apps are monitored and temporarily stored for the purpose of logging significant events and event metadata when you access or use Product Apps.

Usage Information collected automatically may include the following categories of information:

Log Data	ID creations, authentication methods, account expiries, IP address (e.g., geolocation), tokens, last logins, browser information, and permissions.
Device Data	Device information, including battery life, connectivity events, data or connection quality, and server QA data points such as CPU, loads, and network traffic, as well as device information, including device type, operating system, application IDs, unique device identifiers, and crash data.

We may maintain or associate Usage Information with Personal Information we collect from other sources or that you provide to us.

We use Usage Information in the following ways:

- Providing the Products and support;
- Administering, designing, and improving the Products;
- Analytics, e.g., tracking and measuring interactions with the Products;
- Detecting and preventing abuse and security threats;



- Operating and improving our business and services; and
- Complying with legal and regulatory obligations.

Tracking & Cookies Data

R-Zero uses cookies and similar tracking technologies to track the activity on our Products and hold certain information.

“Cookies” are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Products.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Products.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Product.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

Sensor Information

R-Zero’s Products utilize a variety of sensor technologies, including infrared, to provide the intended functionality. These sensors are the product of “privacy-by-design” practices and capture only anonymous data. None of the data collected by the sensors constitutes Personal Information.

R-Zero Product sensors create non-personally identifiable records of events, including:

- Biosafety Event Data – Device usage data, including timestamps (run time) and device identifiers.
- Sensor Raw Event Data – Raw sensor data, including binary occupancy readings and sensor state, BT UUID, battery reading, firmware version, x/y coordinates, and other metadata.
- Occupancy Records – Metadata attached to the raw sensor data includes sensor ID, space IDs, or other method of identification, and any location-based data.

Personal Information We Disclose

We may disclose Provided Information and Usage Information with the following categories of third-party recipients for the purposes described below:

Service Providers	We may share Personal Information and Usage Information with our IT providers as needed to operate the Products and our business, including with software and web hosting providers, and installation services contractors
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Professional Services	We may share Personal Information and Usage Information with our professional services providers, including contractors, security vendors, auditors, information services providers, and professional advisors
Government and Legal	We may share Personal Information and Usage Information with governmental authorities and third parties as may be required by applicable law, regulation, or legal process
Corporate Transaction	We may share Personal Information and Usage Information as part of a Corporate Transaction e.g., to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some of R-Zero's assets, whether as a going concern or as a part of bankruptcy, liquidation or similar proceeding, in which information held by R-Zero about the Products' users is among the assets transferred

Aggregated and anonymized information that is incapable of identifying an individual is not considered Personal Information under this Privacy Policy. We may disclose aggregated and anonymized information, including certain Usage Information, without restriction.

Privacy Rights of California Residents

Under the California Consumer Privacy Act of 2018 and California Consumer Rights Act (together, the "CCPA/CPRA"), and their respective amendments and implementing regulations, California residents are afforded certain privacy rights. If you are a California resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- Right to Know. You have the right to access the specific pieces of Personal Information collected about you, the sources from which such information was obtained, the categories of information that have been sold or disclosed for a business purpose, and the commercial purpose for which the information was collected or sold, provided to you in a reasonably portable format if you have a password-protected account.
- Right to Deletion. You have the right to request that we delete any of the Personal Information we have collected or maintain about you.
- Right to Rectification and Correction. You have the right to rectify and correct inaccuracies in your Personal Information.
- Right to Opt-out of Sales of Personal Information. You have a right to opt-out of the sale of your Personal Information, including cross-context behavioral advertising, and to opt-in again at your election.
- Right to Limit Use and Disclosure of Sensitive Personal Information. You have a right to opt-out of secondary uses and disclosures of your Sensitive Personal Information.



- Right to Opt-out of Automated Decision-making. You have the right to opt-out to certain types of automated decision-making, subject to certain exceptions.
- Right to Non-Discrimination. You have a right to not be discriminated against in the event you exercise your other rights listed above. If you exercise these rights, R-Zero will not deny you goods or services, charge you a higher rate, or provide you with lower quality products.

Exercising Your Rights Under the CCPA/CPRA. You, or an authorized agent, may exercise your rights by submitting a request to our Legal Team at legal@rzerosystems.com. The CCPA/CPRA allows for one disclosure request per 12-month period at no cost to you. For subsequent requests, we may charge a fee if we determine that the request is excessive, repetitive, or manifestly unfounded, but will not do so without providing you with a cost estimate before processing your request.

We respond to and process requests promptly and within the timeframes required by the CCPA/CPRA. Please note that all requests are subject to proper prior verification before processing, as required by the CCPA/CPRA.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual's rights on their behalf.

Sale of California Resident Personal Information. With respect to the scope of this Privacy Policy, R-Zero does not "sell" Personal Information as such term is defined by the CCPA/CPRA. Furthermore, we have not sold Personal Information in the preceding 12-months.

Privacy Rights of Utah Residents

Under the Utah Consumer Privacy Act ("UCPA"), effective December 31, 2023, Utah residents are afforded certain privacy rights. If you are a Utah resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- Right to Know. You have a right to know or confirm the processing of your Personal Information.
- Right to Access and Portability. You have a right to access Personal Information maintained about you and to obtain a copy of personal data in a portable and readily usable format.
- Right to Deletion. You have the right to request that we delete any of the Personal Information we have collected or maintain about you.
- Right to Opt-out of Targeted Advertising and Sales of Personal Information. You have a right to opt-out of targeting advertising and the sale of your Personal Information.
- Right to Non-Discrimination. You have a right to not be discriminated against in the event you exercise your other rights listed above. If you exercise these rights, R-Zero will not deny you goods or services, charge you a higher rate, or provide you with lower quality products.

Exercising Your Rights Under the UCPA. You, or an authorized agent, may exercise your rights by submitting a request to our Legal Team at legal@rzerosystems.com.

We respond to and process requests promptly and within the timeframes required by the UCPA. Please note that all requests are subject to proper prior verification before processing.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual's rights on their behalf.



Sale of Utah Resident Personal Information. With respect to the scope of this Privacy Policy, R-Zero does not use personal data for the purposes of targeted advertising or “sell” personal data as such term is defined by the UCPA.

Privacy Rights of Canadian Residents

Under Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA) and the Provincial Privacy Acts (together, the “Canadian Privacy Laws”), and their respective amendments and implementing regulations, Canadian residents are afforded certain privacy rights. If you are a Canadian resident, subject to certain limitations, you have the following rights concerning your Personal Information:

- Openness and Transparency. You have the right to know the Personal Information we collect about you and the purposes for its collection.
- Access. You have the right to access Personal Information we maintain about you, subject to certain exceptions.
- Correction. You have the right to correct inaccuracies in Personal Information we maintain about you.
- Right to Deletion. You have the right to request that we delete Personal Information we have collected or maintain about you.
- Right to De-indexing. You have the right to request your Personal Information be “de-indexed” from certain types of distribution.
- Right to Withdraw Consent. You have the right to withdraw consent to our use of your Personal Information, subject to certain exceptions.

Exercising Your Rights Under the Canadian Privacy Laws. You, or an authorized agent, may exercise your rights by submitting a request to our Legal Team at legal@rzerosystems.com.

We respond to and process requests promptly and within the timeframes required by the Canadian Privacy Laws. Please note that all requests are subject to proper prior verification before processing.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual’s rights on their behalf.

Transfer of Canadian Personal Information. Your Personal Information may be transferred to third countries where an adequate level of data protection can be ensured, including the United States. By sharing Personal Information with us, you consent to the transfer of your Personal Information to such third countries.

International Transfer of Your Personal Information

Your Personal Information may be transferred to third countries, including the United States, which may have different or less privacy protections than your own country. By sharing Personal Information with us, you consent to the transfer of your Personal Information to such third countries.

Retention Period

We will retain your personal data for a period of time commensurate with the purpose(s) of the processing.



Security of Personal Information

R-Zero takes reasonable efforts to protect Personal Information. If any of the Personal Information we maintain about you is the subject of a breach of Personal Information under applicable law, we will take such actions, including providing you with notification, as such law or laws may require.

Changes to Privacy Policy

If we decide to change this Privacy Policy or our practices, we will post a notice of those changes to our Privacy Policy on our website in advance of the changes taking effect, so that you are always aware of our current policy and practices.

Contacting R-Zero

For exercising your applicable privacy rights or if you have any questions, concerns or complaints about the manner in which your Personal Information has been collected or handled by R-Zero, please contact our Legal Team at legal@rzerosystems.com.

Last Modified: August 5, 2022