



## **Privacy Policy**

### **OASIS Platform**

This Privacy Policy applies to AiFi Inc.'s ("AiFi", "we", "our" or "us") processing of all personal data and personal information (as defined below) by the AiFi Auto-Checkout Solution OASIS ("OASIS Platform").

The purpose of this Privacy Policy is to be transparent about the way we collect, use, and protect personal data and personal information as part of the OASIS Platform.

#### *❖ What is personal data?*

The General Data Protection Regulation (GDPR) states that personal data is any information about an identified or identifiable natural person. This means that information is either directly about someone or can be traced back to this person.

#### *❖ What is personal information?*

The California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) defines "personal information" as 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.

#### *❖ About us*

AiFi processes personal data and information through the OASIS Platform on behalf of our client who is the data controller. AiFi may process the following types of personal data and personal information: contact information (such as name, address, email address, and telephone number) and the last 4 digits of a shopper's credit card.

For more information on how AiFi processes personal data and information, see [AiFi's website](#). For further questions, please see our approach to biometric information available [here](#).

#### *❖ For what purposes do we process personal data and information?*

AiFi processes personal data and information for the purposes of providing the OASIS Platform to our clients in accordance with a signed, written agreement. More specifically, personal data and information is processed for our clients to provide its shoppers with a frictionless checkout-free shopping experience, as well as for the following purposes:

Purpose	Explanation	Data	Access
Improving the OASIS Platform, including, but not limited to, the accuracy thereof.	In order to review a picked-up item due to not reaching accuracy threshold. Anonymized data and technical data is used for training purposes. All time stamp (and if applicable location data) is removed.	Anonymized video, anonymous tracking token, sensor data, movement of a tokenized stick figure, item information, tracking to inventory data, and virtual basket information.	For this purpose, no personal data is being processed. The training data is used for training the AI and will become a part of the AI data.
DAT contested item on receipt (if outsourced to AiFi)	In order to review a picked-up item in case of a contested item by a shopper.	Blurred video snippets, (live) basket, receipt items, and picked up items.	Temporary and only if the OASIS system indicates that the DAT agent should review.
Problem solving	If the OASIS system encounters downtime or technical problem and AiFi needs to resolve the fault in the system.	Anonymized video, anonymous tracking token, sensor data, movement of a tokenized stick figure, item information, tracking to inventory data, virtual basket information and all other technical data that could be required.	AiFi will only have access to the data during the time the problem is not solved.
Storage	If the local store facilities are unable to provide sufficient storage for raw video, AiFi can provide storage at the AiFi cloud.	Video automatically gets blurred on premise before it's uploaded to the AiFi cloud. Blurred video is stored. All data, tracking stick figure (uploaded in cloud later).	AiFi will only store the data for this purpose and will not process it in any other way. AiFi will only gain access on request of the retailer, for example to delete the data or to send a copy of the data to the retailer.
Analytics	In the near future retailers can use the OASIS system for analytics purposes. AiFi will provide a dashboard with analytics based on the specific preferences of the retailer.	Anonymized video, anonymous tracking token, sensor data, movement of a tokenized stick figure, item information, tracking to inventory data, virtual basket information, and all other technical data that could be required.	Processing data only for creating a dashboard. Limited access for AiFi employees, only for problem-solving. Aggregated / anonymized data will be used by AiFi for benchmark purposes.

❖ *Rights of EU Residents under GDPR*

Residents of the European Union have the right to be well-informed about what AiFi does with their personal data and why their personal data is required. In addition to the right to be informed, EU residents have the following rights:

- Right to access (if you want to know which personal data is collected about you);
- Right to rectification (we are happy to adjust any personal data that is no longer correct);
- Right to be forgotten (in some cases you can ask your employer to delete your personal data);
- Right to restrict processing (in some cases you can ask your employer to restrict the processing of your personal data);
- Right to data portability (if you want, your employer can pass on your personal data to another party or give you a copy of your personal data);
- Right to object (in some cases you can object to the use of your personal data).

If an EU-resident wants to exercise their rights, they can contact the controller at [compliance@aifi.com](mailto:compliance@aifi.com).

❖ *Who do we share personal data with and where do we store it?*

**List of Subprocessors and Description of Data Transfers**

**Microsoft Azure**

Address: Microsoft EU Data Protection Officer

One Microsoft Place, South County Business Park, Leopardstown

Dublin 18, D18 P521 - Ireland

Data transferred: Anonymized video footage of a shopper including time and location metadata

Duration of processing: Duration (period) of processing corresponds to duration of the Master Agreement, according to the Article 10

Nature of processing: storage of data

**Fusion BPO Services**

Address: Rr. e Kavajes, Ish Kinema Republika, Kt.7, Tirana, Albania

Data transferred: Anonymized video footage of a shopper  
Duration of processing: Processing is conducted only once  
Nature of processing: use of data

### **Fusion BPO Services**

Address: 43, Boulevard d'Anfa, Casablanca, Morocco, 20250  
Data transferred: Anonymized video footage of a shopper  
Duration of processing: Processing is conducted only once  
Nature of processing: use of data

### **Fusion BPO Services**

Address: Ankurhati Rd, Mukherjee Para, Makardah, Howrah, West Bengal 711302, India  
Data transferred: Anonymized video footage of a shopper  
Duration of processing: Processing is conducted only once  
Nature of processing: use of data

#### ❖ *How long do we keep personal data?*

We keep personal data as long as necessary for the purpose for which we use such data and/or as long as the law requires us to keep it. How long that is varies from a few months to many years depending on the uses. Please see our Record Retention policy available on [AiFi's website](#) for more details on our retention period(s).

#### ❖ *How do we protect personal data?*

Under Article 32 GDPR, we are obliged to take appropriate technical and organizational measures to prevent the loss of personal data or unlawful processing. The security of personal data is secured through appropriate physical, administrative, organizational and technical measures.

#### ❖ *Notice to California Residents*

This notice to California residents is provided under the CPRA. We collect the following categories of information:

Data relating to individuals provided to AiFi in connection with the Services, by (or at the direction of) the controller. Inter alia:

- Anonymized video
- Raw video
- Blurred video snippets
- Manually uploaded data
- Anonymous tracking token
- Technical (and sensor) data
- Product information
- Virtual basket information
- Movement of tokenized stick figure
- Tracking to inventory data

This information is collected from the sources and for the purposes more fully described above. We do not sell, rent, or lease personal information to third parties.

California residents have the following rights under CPRA with respect to personal information:

- The right to know about the personal information that is collected about you and to know how it is used and shared;
- The right to delete personal information collected from you consistent with applicable law;
- We do not sell personal information to third parties, but you have the right to opt-out of the sale or sharing of your personal information;
- The right to non-discrimination in exercising your rights;
- The right to correct inaccurate personal information that we have about you; and
- We do not collect sensitive personal information (as that term is defined in the CPRA).

If a California resident has any questions about their rights under CPRA or AiFi's processing of their personal information please contact [compliance@aifi.com](mailto:compliance@aifi.com).

#### ❖ Making Access and Deletion Requests

To make an access or deletion request, please contact the controller at [insert]. Before completing a request, AiFi may need to verify the requestor's identity. AiFi may request additional documentation or information solely for the purpose of verifying the requestor's identity.

❖ Instructions for Authorized Agents Making Access and Deletion Requests

An individual may also use an authorized agent to submit an access or deletion request on their behalf. Authorized agents may submit access and deletion requests by contacting the controller at [insert]. Before completing requests from authorized agents, we may contact the requestor directly to confirm that they give their permission and/or to verify their identity.

❖ *Contact and complaints*

Questions or comments about this Privacy Policy should be directed to [compliance@aifi.com](mailto:compliance@aifi.com).

Complaints about, for example, the way we use personal data or information or how we respond to privacy-related questions can be filed with the European Union Data Protection Authority or the California Privacy Protection Agency.

**May, 2024**