



# Privacy statement





The data controller is No Isolation AS (Norway), No Isolation BV (the Netherlands) and No Isolation Ltd (UK) jointly. No Isolation AS is the main responsible and contact point.

AV1 is developed with privacy as a basic principle. We collect as little data as possible and have taken a number of security measures to protect the data we process.

Learn more about which personal information we collect, what security measures we take and which rules apply when individuals, organisations and schools or municipalities that purchase AV1.

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## Personal data

### Briefly explained

We do not collect any contact information from the AV1 user. Some metadata is collected when AV1 is in use for the purpose of invoicing and support.

While using AV1, a direct stream is sent from the classroom between the AV1 and a separate AV1 app that the child uses. The video stream is end-to-end encrypted, which means that it is not possible for anyone other than the user of the app to access what is happening in the classroom. The video stream cannot be stored, either by No Isolation, the user or anyone else.

We only collect the name and contact information from our customers, which can be, for example, a school, organisation, municipality or the child's parents. We, therefore, do not know who the user of the AV1 app is, but only who the AV1 device is purchased from. The AV1 app collects metadata about usage needed for support and proper billing.

The metadata collected is:

- Length and quality of video transmission
- Date and time of video transfer
- Wireless network information
- Connection Strength
- Mobile Network Information

The information is only linked to the robot's serial number and customer, and it is therefore not possible for No Isolation to directly identify who the user of the AV1 app is. All metadata is anonymized when there is no longer an active subscription for AV1. Data can also be deleted on request by sending an email to [privacy@noisolation.com](mailto:privacy@noisolation.com).

Only technical personnel at No Isolation subject to the duty of confidentiality have access to the information mentioned above. The information is never disclosed to third parties other than our data processors unless it is subject to mandatory law. No Isolation will notify the data subjects by requesting the disclosure of information unless it follows from mandatory law that it is not allowed to notify the registered persons.

### Information about use

In some cases where an AV1 has been donated, for example from a foundation or an organisation, there will be a need to keep an overview of whether AV1 has been used. The overview will then be shared with the foundation or organisation that has donated AV1. The user must be informed of this by the organisation/foundation.



### **Our administration system**

Customers who buy several AV1s can access our admin system. This can be, for example, schools or other institutions that offer AV1s to their students and users. There they can, among other things, generate keywords and assign a contact person to each AV1. In connection with the use of the administration system, the following metadata will be visible to the administrator:

- Network and Connection Strength Information
- Information about when the robot last contacted our servers

### **AV1 Assistant**

In the AV1 Assistant app, an assistant can connect to AV1 with a keyword to see AV1's status, battery percentage, network information, etc. AV1 user can see an overview of all assistants in his app.

## Privacy by design

**Briefly explained:**

To safeguard the privacy of users and those around the robot, and to ensure that video streaming is as secure as possible, we apply a number of security measures. Examples are the on / off button and the video stream is end-to-end encrypted.

### **The robot clearly shows when the user is connected**

When the user is online AV1 lights their eyes and head so that everyone around can see if AV1 is active or not.

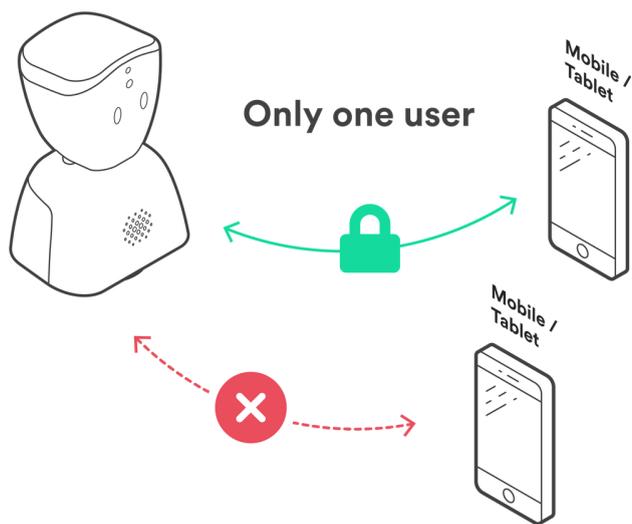
*AV1 when the user is connected*

**The robot can be turned off**

If it is not appropriate to use AV1, or AV1 is in the teacher's room, you can turn off the robot with a button on the back next to the charging input.

**One user**

The first time the user connects to their AV1, they use a one-time keyword. Then he/she creates a secret PIN. The terms of the app state that parents/others are not allowed to connect to AV1, and it is considered a breach of contract if they do so. No Isolation has the ability to permanently remove the user's access.



The user can only be connected with one device at a time, and must use a new one-time keyword if they are to change device. They then lose access to the other device.

**End-to-end encrypted video stream**

The video-stream is end-to-end encrypted, and it is only possible to access the stream for the app user. Neither No Isolation nor anyone else can access and decrypt the stream.



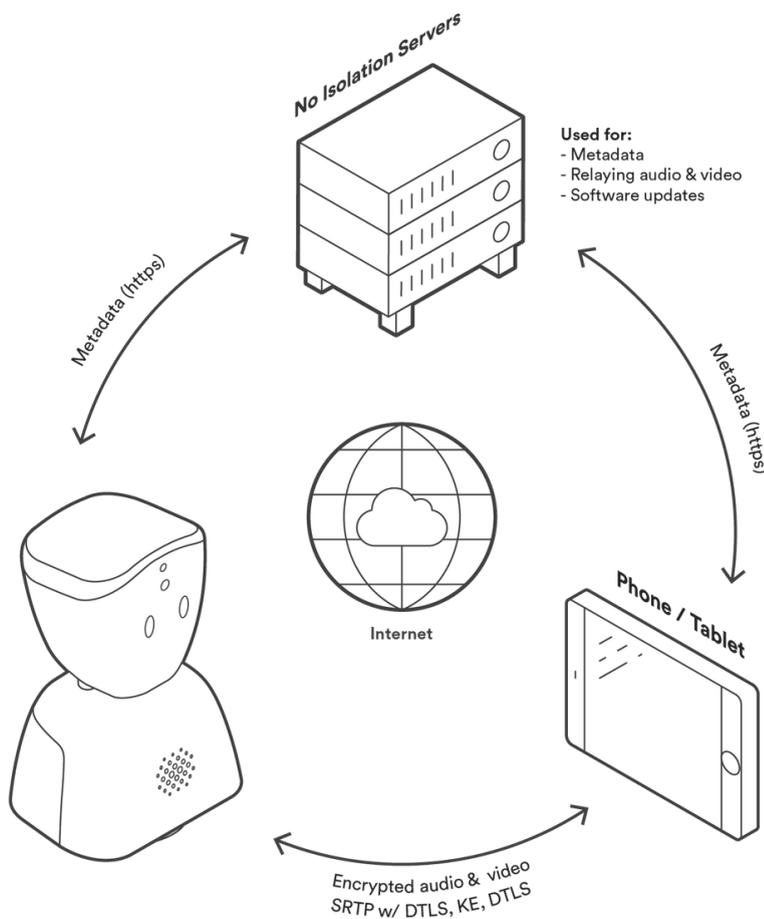
# AV1

## Nothing is stored

It is only possible to use AV1 in real time. This means that you cannot record or store a video stream. In order to communicate with the child sitting behind the AV1, one must be present when it happens.

If the user attempts to take a screenshot during streaming, he / she will be warned that it is not allowed and is thrown out of the app. It is also not possible to connect the tablet or phone to an external TV or computer monitor to display the video stream. Both screens will then go black, and the user will then be banned from the app. In both cases, the user must contact No Isolation to unlock their access again. No Isolation has the ability to permanently remove the user's access.

## Network Overview





## **Your rights**

You have the right to request access, correction and deletion of your personal information. You also have the right to complain to the Data Inspectorate.

## **Joint processing responsibility**

No Isolation AS, No Isolation BV and No Isolation Ltd have joint processing responsibility for processing personal data. We have an agreement between the three companies where the responsibility is regulated.

## **Subcontractors**

No Isolation uses the following subcontractors to deliver the service:

- Twilio Inc. is a cloud service provider that delivers the TURN server we use to set up the video transfer between AV1 and the user's app if they can't connect directly. The video stream is still end-to-end encrypted and inaccessible for Twilio. Data processing happens in the United States.
- Amazon Web Services Inc. is a cloud service provider that we use for our servers that include metadata and customer data. We have an agreement (DPA) that the processing should take place in the EU/EEA.
- MongoDB Inc. is a cloud service provider that we use for our servers that include metadata and customer data. The processing takes place in the EU / EEA.
- Functional Software Inc. (Sentry) is used to record errors that occur in our systems and apps. Processing is in the United States.
- Digital Ocean Inc. is a cloud service provider that we use for the servers we use to troubleshoot AV1. Processing is in the United States.
- Zendesk Inc. is the system provider we use to allow users to chat with our customer support through the AV1 app.

## **Data sent out of the EU**

The EU Commission has decided that data can be transferred from the EU to US if both data suppliers join the framework Privacy Shield. All our subcontractors that are based in the USA are certified under EU-US Privacy Shield.

You can read more about Privacy Shield here

<https://www.privacyshield.gov/list>

## **Our contact information**

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