

## Legal opinion

To:	OneRobotics (Shenzhen) Co., Ltd.
From:	TMI Associates
Date:	18 December 2025
Subject:	<b>Risk Assessment Regarding Compliance with Japan’s Act on the Protection of Personal Information (APPI)</b>

TMI Associates has been requested by OneRobotics (Shenzhen) Co., Ltd. (“OneRobotics”) and its affiliates (collectively, “Group”) to provide this legal opinion regarding compliance with Japan’s Act on the Protection of Personal Information (the “APPI”) by SwitchBot Co., Ltd., (“SwitchBot”), based on a risk assessment conducted by our firm. This opinion is prepared solely for the benefit of OneRobotics for the purpose of submission to securities regulatory authorities or exchanges and may not be relied upon by any other person or entity without our prior written consent.

This opinion is based solely on the following documents and information provided by OneRobotics as of November 17, 2025:

1. 《卧安数据合规管理制度》 (*Woan Data Compliance Management Policy*)
2. 《卧安信息安全管理制度的》 (*Woan Information Security Management Policy*)
3. 《卧安科技数据分级分类管理制度》 (*Woan Technology Data Classification and Grading Management Policy*)
4. *Sample Training Records*
5. *Japan Personal Data Handling Supplementary Policy*
6. *Standalone Website of SwitchBot (available at <https://www.switchbot.jp/>)*
7. *Privacy Policy (available at <https://www.switchbot.jp/pages/privacy-policy>)*

8. *Shopify Data Processing Addendum with Shopify* (available at <https://www.shopify.com/jp/legal/dpa?country=jp&lang=en>)
9. *Data Processing Agreement with Zendesk*
10. *Data Processing Agreement (DPA) with Mabang*
11. *Tuya Data Processing Addendum with Tuya* (available at <https://developerapp.tuya.com/protocol/1b616036d8404030?lang=en>)

We have not conducted any independent verification or factual investigation beyond reviewing the above materials. In particular, we have not conducted due diligence, interviews, or on-site inspections concerning Group's actual business operations in Japan. The descriptions contained in "I. Basic Overview of Group's Business Operations in Japan" and "II. SwitchBot's System Deployment and Data Processing in Japan" are based solely on information confirmed by OneRobotics and our analysis and conclusions herein are premised on the assumption that such descriptions as well as the contents of the above-listed materials are true, accurate, and complete in all material respects. We do not express any opinion as to the factual accuracy of such information.

[Disclaimer]

This opinion is strictly limited to the interpretation and application of the APPI of Japan, as in effect on the date hereof. We do not express any opinion on other laws in Japan or the laws of any other jurisdiction. We also do not express any opinion on accounting, tax, technical, or business matters.

This opinion is not intended to and does not constitute a guarantee, certification, or assurance of SwitchBot's compliance with the APPI or any other laws. Our assessment reflects our professional judgment based on the materials and information made available to us and should not be construed as a statement of fact or a prediction of the outcome of any regulatory review, investigation, or enforcement action. This opinion is given solely for the purpose described above and may not be reproduced, quoted,

distributed, or otherwise referred to in whole or in part without our prior written consent, except for in regards to submission to the relevant securities authorities or exchanges as expressly intended by OneRobotics. We assume no obligation to update or supplement this opinion in light of any subsequent changes in law, regulation, or facts occurring after the date hereof.

## **I. Basic Overview of Group's Business Operations in Japan**

Group is an AI-embodied home robotics system provider dedicated to building an ecosystem centered on smart home robot products. As of the date of issuance of this Legal opinion, Group has a variety of products such as smart vacuum robots, smart vacuum cleaners, smart door locks, smart doorbells and cameras, and smart curtains. Group primarily targets markets outside China and sells the aforementioned intelligent connected products through overseas standalone websites and overseas third-party e-commerce platforms.

Group's business operations in Japan are managed by SwitchBot which is responsible for marketing, customer support, and after-sales services in the Japanese market, as well as managing local operational activities such as social media promotions, offline retail coordination, and customer service.

SwitchBot primarily sells smart home products directly to consumers in the Japanese market through its standalone website ([switchbot.jp](http://switchbot.jp)) and third-party e-commerce platforms (e.g., Amazon Japan and Rakuten Japan). In addition, SwitchBot also sells smart home products to agents or distributors through online agent channels (Amazon Vendor Central) and offline distributor channels (e.g., Costco, Yodobashi and Bic Camera), who then sell the smart home products to consumers. As of the date of issuance of this Legal opinion, there are more than 1.8 million users in Japan.

## **II. SwitchBot's System Deployment and Data Processing in Japan**

The key information systems supporting SwitchBot's business operations in Japan primarily includes the standalone website sales system, video cloud storage service system, App & smart device cloud storage system, third-party Mabang ERP logistics system, third-party Zendesk system for customer service management, and Japan-based NAS server.

To continuously support the operation of smart products, SwitchBot provides the SwitchBot App for users to bind and configure smart products, remotely control smart products, and establish home groups, among other functions. The information systems and corresponding data processing involved in SwitchBot's business operations in Japan are as follows:

(1) Standalone Website Sales System. This system is a standalone website for SwitchBot product sales (switch-bot.com, with the Japan node being switchbot.jp) built on the third-party Shopify platform, primarily used to provide product introduction, product purchase, and shipping functions. For this system, the data of Japanese users is typically stored on nodes in Japan. However, due to cloud server load balancing and other operational needs, user data may also be allocated to and stored on nodes in the United States, Canada, or Singapore. Such use of foreign nodes is solely for the technical operation of the cloud infrastructure and does not imply that any overseas Group entity accesses or retains such information. The data processed by this system mainly includes user account registration data on the standalone website, purchase history, shipping information, payment information, browsing history, and cookie records. Although SwitchBot collects cookies on its website, such cookies are not provided to any third-party other than entrusted service providers. Regarding user data related to product sales, OneRobotics may occasionally access such data when assistance is required, for example; to support product troubleshooting or after-sales services.

(2) Video Cloud Storage System. This system is primarily used for the video storage function of Cam products (with video recording capabilities, including SwitchBot



Pan/Tilt Cam). It provides remote monitoring services such as event video storage and real-time viewing to users who have activated video subscription features. The system primarily utilizes a dedicated video cloud storage service provided by the third-party provider Tuya, with data stored on the AWS site. The data processed by this system mainly includes event videos and image data. Such video/image data can only be accessed by users through a unique account and password provided by the third-party provider Tuya. SwitchBot is unable to access or retrieve this data.

(3) App & Smart Device Cloud Storage System. This system is primarily used to support and respond to the functionalities of the SwitchBot Application and intelligent connected devices. The components that serve Japanese user requests are deployed on nodes in Japan. The data processed by this system mainly includes user's application account registration data (email address, nickname, password, preferred language), account login records (date, time, IP address), bound smart product information, App mobile device information (device ID, model, OS version), smart product device information (MAC address, serial number), device event data (e.g., power-on/off records, cleaning paths, battery levels), scene settings (scene name, conditions, execution actions, validity period), home group information, and App geolocation information. Among these, the App geolocation information is mainly used for supporting certain products involving geofencing (e.g., automatic unlock (beta) function of Lock Pro or Lock Ultra). For certain products/scenes, the location information is only processed locally within the App, in which case SwitchBot does not collect, track, or store users' location information.

(4) Third-party Mabang ERP Logistics System. This system is primarily used for order shipments on the standalone website. Order data from the standalone website system is directly integrated with this system, which then transmits the data to the corresponding overseas warehouses for shipment. This system is provided by the third-party Mabang and is deployed on the Singapore node. The data processed by this system mainly

includes order data (product information and quantity) and shipping data (shipping address, recipient's name, and recipient's contact information).

(5) Third-party Zendesk System for Customer Service Management. This system is primarily used to handle after-sales service requests from Japanese users, providing functions such as online customer support chat and service record tracking. This system is provided by the third-party Zendesk Inc., with components serving Japanese user requests deployed on nodes in Japan. The data processed by this system mainly includes customer service information (e.g., customer service records and case handling status).

(6) Japan-based NAS Server. This system is primarily used for storing internal operational data of SwitchBot, involving a minimal amount of user personal information. Specifically, it includes personal data collected by SwitchBot when conducting raffle activities on social media (e.g., X and Instagram), including participant names, phone numbers, and email addresses.

(7) Third-party E-commerce Platform System. Data (email address, address, and purchase history) generated when users purchase products through third-party e-commerce platforms (e.g., Amazon Japan and Rakuten Japan) is stored on the servers of these third-party platforms. Logistics data is directly pushed by Amazon Logistics to overseas warehouses for shipping and such data is processed by third-party e-commerce platforms. SwitchBot only accesses and handles issues in the third-party e-commerce platform system in exceptional cases, such as missing items during shipping or other after-sales issues. Data provided by consumers when purchasing products through agent or distributor channels is collected, used, and processed by agents or distributors. SwitchBot neither obtains nor has the capability to access user data from such channels.

(8) Processing of Biometric Features. While some products are related to biometric features, SwitchBot does not engage in the collection, storage, or processing of biometric features. For instance, in the case of the fingerprint unlocking function on smart door locks, the fingerprint information is only stored locally on the device and is not uploaded to cloud servers. Additionally, as of the date of issuance of this Legal

opinion, SwitchBot is not involved in the analysis, extraction, storage, or processing of facial recognition features or voiceprint recognition features.

### **III. SwitchBot Data Privacy Compliance Risk Assessment**

#### **(I) Notification**

##### **1. Japanese Laws and Regulations**

Under the APPI, the data controller must provide individuals with certain information including: the purpose of use of personal information; details of any joint use (if applicable); matters concerning anonymized personal information, such as the categories of information contained therein and, if it is to be provided to a third-party, the method of such provision (Articles 21, 27-5(2), 43-3, and 44). In addition, the following information must be made accessible to individuals, including by responding without delay upon their request: the data controller's name, address, and representative or manager; the purpose of use of personal information; procedures (including fees) for the exercise of data subject rights; contact details for complaints; and the measures implemented for the safety management of personal information (Article 32). These statutory obligations may be satisfied by establishing and publicly disclosing an appropriate privacy policy.

##### **2. Company Compliance Status**

SwitchBot sells smart home products to Japan and collects personal information through the following channels:

(1) Standalone Website Scenario. The standalone website (<https://www.switchbot.jp/>) provides a Privacy Policy accessible from the homepage. The Privacy Policy sets out the information required under the APPI; including the purpose of use, details of any data sharing, data subject rights and related procedures, safety management measures, cross-border transfer information, and contact details. As no anonymized information is created, the Privacy Policy appropriately covers all matters that must be notified or

made accessible to individuals. Accordingly, the Privacy Policy satisfies the statutory requirements.

(2) App Scenarios. For both the Google and Apple versions of the application, users are informed of the Privacy Policy and their consent is obtained on the registration page of the application. The content of the Privacy Policy provided there is identical to that displayed on the standalone website. Therefore, the statutory notification requirements are likewise fulfilled in the app context.

## **(II) Legal Basis for Personal Information Processing**

### **1. Japanese Laws and Regulations**

Unlike the EU GDPR, the APPI does not require a legal basis for the mere processing of personal information. Instead, the APPI adopts a prohibitory approach, processing is permitted so long as it does not fall under any form of “inappropriate handling” (Article 19). In other words, the law does not mandate the establishment of legal grounds for processing but rather prohibits certain harmful or unjust practices that may foment or induce unlawful or unjust acts.

### **2. Company Compliance Status**

Based on the information available to us, we have not identified any circumstances under which SwitchBot’s processing of personal information would be considered inappropriate or otherwise unlawful under the APPI.

## **(III) Special Rules for Processing Sensitive Personal Information**

### **1. Japanese Laws and Regulations**

Under the APPI, the acquisition of sensitive personal information, in principle, requires prior consent except in cases permitted by law or when necessary to protect a person’s life, body, or property and obtaining the individual’s consent is difficult, among other



limited exceptions (Article 20). Sensitive personal information is defined as personal information that includes information concerning a person's race, creed, social status, medical history, criminal record, fact of having suffered damage by a crime, etc. (Article 2, paragraph 3).

## **2. Company Compliance Status**

According to the information provided by OneRobotics, while some products are related to biometric features, that may fall into sensitive personal information, SwitchBot does not engage in the collection, storage, or processing of biometric features. For instance, in the case of fingerprint unlocking function on smart door locks, the fingerprint information is only stored locally on the user's device and is not uploaded to cloud servers. Accordingly, no obligations relating to the processing of sensitive personal information are imposed on SwitchBot.

## **(IV) Protection of Minors' Personal Information**

### **1. Japanese Laws and Regulations**

Under the APPI, there are no specific provisions regarding the processing of personal information of minors. However, according to the Q&A published by the Personal Information Protection Commission (PPC), if a child does not have the capacity to understand the consequences of giving consent, consent must be obtained from a legal representative or a guardian instead of the child. Accordingly, the appropriate age is not uniformly defined and should be determined on a case-by-case basis. Nevertheless, it is generally understood that consent should be obtained from a legal representative or other guardian when the child is approximately 12 to 15 years old or younger. However, it should be noted that the personal information of minors does not automatically constitute sensitive personal information under the APPI.

### **2. Company Compliance Status**

According to the information provided, SwitchBot does not collect personal information from individuals under the age of 18. Therefore, no issues arise with respect to the processing of minors' personal information.

## **(V) Data Storage**

### **1. Japanese Laws and Regulations**

Regarding data storage locations, APPI does not impose data localization requirements. The data controller shall endeavor to retain personal information as long as necessary to achieve the purpose. This obligation regarding retention is an obligation of best efforts and does not constitute a direct statutory requirement.

### **2. Company Compliance Status**

As described above in “II. SwitchBot’s System Deployment and Data Processing in Japan” and stipulated in clause 15 of the *Woan Data Compliance Management Policy*, although Japan does not mandate data localization requirements, SwitchBot has adopted a data localization strategy when storing the data of Japanese users and in principle, data of Japanese users is stored on nodes in Japan. Regarding data storage periods, as described in the Privacy Policy, personal information collected by SwitchBot is stored on a long-term basis as long as (i) users are using SwitchBot’s products or services, (ii) during the validity period of users’ account, (iii) when necessary to provide services to users, (iv) when obliged by applicable laws, (v) when necessary for resolving issues, or (vi) when necessary to fulfill a contract. Personal information that is no longer required for storage will be deleted in accordance with applicable laws. Such data will be deleted when users delete their accounts or initiate data deletion requests. In addition, device usage records for users are retained for one year and are automatically deleted upon expiry as stipulated in Article 4.4 of the *Woan Technology Data Classification and Grading Management Policy*. These practices are in full compliance with the aforementioned legal requirements of the APPI.

## **(VI) Disclosure and Transfer of Personal Data**

### **1. Japanese Laws and Regulations**

#### **(1) Regulations on the Disclosure of Personal Data (Applicable to Both Domestic and Overseas Recipients)**

The disclosure or provision of personal data to a third-party generally requires the individual's consent, unless an exemption applies, for example; disclosure required by laws and regulations, or disclosure necessary to protect the life or property of an individual in an emergency (Article 27). The APPI also provides an additional exception known as joint use, typically used among group companies. In this exception, personal information may be shared without obtaining consent from data subjects if the following items are notified or made publicly available in advance (Article 27-5(3)): (i) the categories of personal data to be jointly used, (ii) the scope of the joint users, (iii) the purpose of joint use, and (iv) the name and address of the person responsible for the management of such personal information.

#### **(2) Regulations on Cross-Border Transfers of Personal Data (Additional Requirements When the Recipient Is Located Outside Japan)**

Cross-border transfers of personal data generally require the individual's consent under the APPI (Article 28). Consent is not required in the following cases:

- (i) When the transfer is made to a country designated by the PPC as providing an adequate level of protection (China is not included); or
- (ii) When the foreign recipient has established systems that meet the standards prescribed by Japanese law and can continuously ensure "Equivalent Protective Measures". "Equivalent Protective Measures" require that the overseas recipient processes the personal data appropriately and reasonably, in accordance with the

elements of Chapter 4, Section 2 of the APPI, based on either the recipient's internal rules or contractual arrangements between the recipient and the data exporter.

In summary, Japan's data protection framework imposes two overlapping sets of requirements:

- a. Restrictions on the disclosure of personal data to third parties (Article 27); and
- b. Additional restrictions on cross-border transfers of personal data (Article 28).

Accordingly, when personal data is transferred from a Japanese entity to an overseas entity, both sets of requirements must be satisfied.

## **2. Company Compliance Status**

Personal data of Japanese users collected by SwitchBot through the standalone website or the application may be accessed by OneRobotics for the purpose of supporting product troubleshooting or after-sales services. Access from China constitutes both a disclosure of personal data and a cross-border transfer. Accordingly, compliance with both regulatory layers is required.

With respect to the disclosure requirements, individual consent would ordinarily be necessary. However, as noted above, consent is not required where personal data is shared under a valid joint use arrangement that has been publicly announced. The Privacy Policy provided by SwitchBot contains a clear provision on joint use, expressly specifying that personal data may be shared with OneRobotics. Therefore, disclosure requirements under the APPI are satisfied.

With respect to cross-border transfer requirements, the *Japan Personal Data Handling Supplementary Policy* indicates that OneRobotics has adopted special internal rules governing the handling of personal data received from Japan. These rules satisfy all obligations imposed by the APPI and therefore constitute Equivalent Protective Measures. Accordingly, the cross-border transfer requirements are also met.



In light of the above, the transfer of personal data from SwitchBot to OneRobotics is lawful under both regulatory frameworks.

## **(VII) Entrusted Processing of Personal Data**

### **1. Japanese Laws and Regulations**

When a data controller entrusts the processing of personal data to a third-party, the controller must exercise necessary and appropriate supervision to ensure that the entrusted party processes the information properly (Article 25). Such supervision is typically implemented by entering into a data processing agreement with the subcontractor, requiring the subcontractor to process personal data in compliance with the APPI, and ensuring that audits or other oversight measures can be conducted as necessary.

### **2. Company Compliance Status**

According to the information provided, certain categories of personal data processed by SwitchBot are entrusted to external service providers. Shopify, Mabang, Zendesk, and Tuya constitute the primary entrusted processors. (It should be noted that, under the APPI, the mere storage of personal data on a cloud platform does not constitute a “provision” of personal data to a third-party where the cloud service provider is contractually and technically prevented from accessing the data.)

Based on the materials reviewed, Data Processing Agreements (or Data Processing Addendum) have been executed with these four service providers, confirming that appropriate supervision over their handling of personal data is ensured. Although the contracting entities are not SwitchBot itself, SwitchBot is able to effectively fulfill its supervisory responsibilities with the support of the relevant Group entities that serve as the contracting parties.

## **(VIII) Response to Personal Data Subject Rights**

### **1. Japanese Laws and Regulations**

Under Articles 33-38 of the APPI, individuals are entitled to the right of access, right to rectification, right to suspension of use, and right to erasure of their personal data. The data controller shall establish a response mechanism to complete responses without delay.

### **2. Company Compliance Status**

SwitchBot has outlined in its Privacy Policy the rights individuals are entitled to (such as the rights to be informed, access, rectification, and erasure) and the channels for exercising these rights (privacy@switch-bot.com). SwitchBot must support users in exercising their rights by making the Privacy Policy readily accessible to data subjects. Only if SwitchBot handles requests from data subjects within 30 days as suggested by the *Woan Technology Data Classification and Grading Management Policy*, is it likely that it will be found to have completed responses without delay.

## **(IX) Cookies Compliance**

### **1. Japanese Laws and Regulations**

Under the APPI, cookies are generally not regarded as “personal information” on their own. Cookies become personal information only when they can identify an individual through linkage with other information, such as an email address or an IP address.

Even in cases where cookies qualify as personal information, the APPI does not require a legal basis for the mere processing of personal information. Accordingly, unless cookies (or related data) are provided to a third-party, there is no requirement to obtain consent. It is sufficient for the data controller to appropriately disclose the purposes of use and other relevant matters in its Privacy Policy.

### **2. Company Compliance Status**

SwitchBot.jp uses cookies, and in cases where such cookies are linked to user accounts, they may constitute personal information. That said, SwitchBot does not provide cookies or related data to any third-party other than entrusted service providers. Accordingly, no obligation to obtain consent arises (as consent is not required for provision to entrusted processors under Article 27-5(1) of the APPI). Therefore, the Privacy Policy appropriately addresses the use of cookies, and SwitchBot's handling of such data can be assessed as compliant with the APPI.

## **(X) Organizational and Institutional Requirements**

### **1. Japanese Laws and Regulations**

Pursuant to Article 23 of the APPI and the PPC Guidelines, data controllers and data processors shall establish necessary and appropriate institutional measures to ensure the security of personal information, including:

- (1) Establishing internal management rules for personal information protection;
- (2) Setting up internal organization for personal information protection; and
- (3) Conducting personal information protection training for internal staff.

The APPI does not require a Data Protection Impact Assessment (DPIA). Additionally, the APPI does not mandate the appointment of a Data Protection Officer (DPO) but recommends designating a person responsible for processing personal information to clarify responsibilities (e.g., overseeing compliance and processing user requests) and providing regular reports to management.

### **2. Company Compliance Status**

SwitchBot has adopted internal policies; including the *Woan Data Compliance Management Policy*, the *Woan Information Security Management Policy*, and the *Woan Technology Data Classification and Grading Management Policy*. Collectively, these policies establish internal management rules and an organizational structure for personal information protection.

Furthermore, SwitchBot provides employee with training pursuant to Article 37 (Training) of the *Woan Information Security Management Policy*, which was also confirmed through the sample training records provided. Accordingly, the company satisfies the requirement to conduct personal information protection training for internal staff.

## **(XI) Security Technical Measures**

### **1. Japanese Laws and Regulations**

Pursuant to the APPI, the data controller must implement technical security measures to ensure the safety of personal information, including but not limited to access control, data encryption, firewalls, vulnerability scanning, and regular security audits (Article 23).

### **2. Company Compliance Status**

SwitchBot has implemented a series of security technical measures, in line with the *Woan Information Security Management Policy* which includes provisions concerning technical security control measures; such as data backup (Article 23), system access control (Article 18), internal IT system control measures (Article 18), and log monitoring (Article 19). It can be concluded that these measures generally meet the required level of security.

## **(XII) Data Security Incidents and/or Regulatory Events**

### **1. Japanese Laws and Regulations**

The APPI requires a report to be submitted to the PPC within approximately three to five days after becoming aware of a potential personal data breach that meets the statutory criteria (Article 26). Notification to the affected data subjects is also required. The APPI also requires the data controller establish a framework for responding to personal data breaches in their internal rules (Article 23).



## **2. Company Compliance Status**

Chapter 8 (“Handling of Information Security Incidents”) of the *Woan Information Security Management Policy* sets out general rules for incident response and provides that reports to the PPC and notifications to data subjects must be made within 3–5 days after becoming aware of the incident (Article 33, Section 2.7). Accordingly, SwitchBot’s internal rule for handling data breaches is considered sufficient.

## **IV. Compliance Assessment Conclusion**

Based on the analysis conducted and the materials made available to us, we confirm that SwitchBot has established documentation and internal policies that align with the obligations imposed under the APPI. The documentation reviewed provides a structured and coherent overview of SwitchBot’s personal data governance framework, reflecting a diligent and organized approach to privacy and regulatory compliance.

In particular, the policies, procedures, and operational materials submitted to us appear sufficient to meet the statutory requirements of the APPI, provided that SwitchBot continues to adhere to the obligations set out therein in its day-to-day operations. While certain areas may benefit from continued monitoring or refinement in light of evolving regulatory guidance, the company’s current level of preparedness may be regarded as broadly satisfactory under the APPI.

Overall, based on the information reviewed, SwitchBot’s personal data processing practices can be assessed as generally compliant with the applicable requirements of Japanese data protection law.

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Yours faithfully,

TMI Associates 2025.12.18

**TMI Associates**