

SUMMARY - PRIVACY NOTICE

General

Your privacy is very important for us at Verisure Arlo Europe DAC, trading as Arlo Europe (“**Arlo Europe**”, “**we**”, “**us**”). Our mission is that you will feel comfortable about us processing your personal data. As the data controller, we are committed to ensuring that all applicable data protection legislation is complied with and that your personal data is appropriately protected.

Scope

This Privacy Notice is applicable to all processing of personal data in relation to you as a current or potential customer and user of our products and services (“**User**”) and if you navigate or interact with our website www.arlo.com (“**Website**”), (“**Website visitor**”).

Collected personal data

The personal data which we collect about you are .

In order to develop our Website and app services, we also use cookies which may contain personal data. You can read more about how we use cookies in our cookie policy, available [here](#).

Our processing of your personal data

We use your personal data to provide you with the products and services we offer in the best possible manner.

If you are a User of our services and products, we process your personal data for the following purposes:

- Administration and performance of contracts,
- Provision of Arlo App which enables you to use our products and services,
- Provide customer service and technical support in relation to our products and services, and
- Training and quality assurance.

As a Website visitor, we process your personal data for the following purposes:

- To analyse the use of our Website and ensure functionality, and
- To provide and administer our online shop.

Lastly, regardless of being a User or Website visitor, we also process your personal data for the following purposes:

- Marketing, including individually targeted direct marketing,
- Customer satisfaction surveys, customer reviews and business development,
- Administration in connection with acquisitions, restructuring, etc.,
- Defending our legal interests in the event of a dispute, and
- Complying with legal obligations, including sharing personal data with law enforcement or other authorities.

We do not use your personal data for any other incompatible purpose and we only retain your personal data as long as it is necessary.

We may in some cases disclose your personal data to other group entities, IT providers, our outsourced customer service provider or companies, with whom we cooperate with to provide our products and services. Please see section 7 for more information about who we share your personal data with. We will not sell your personal data to anyone.

Your rights

You have the right to be informed about which personal data relating to you we process and what we do with your personal data. You have also right to control how your personal data is being processed, which entails that you have the right of access to your personal data and in certain situations to have your personal data erased, to restrict the processing of your personal data as well as right to data portability. You also have in some instances right to object to our processing of your personal data. If we process your personal data based on your consent, you always have the right to withdraw your consent. If you believe that we have processed your data in an unlawful manner, you have the right to lodge a complaint to the Data Protection Authority in your home Member State.

Complete Privacy Notice

This is a summary of our Privacy Notice. If you want to know more about how we process your personal data and about your rights as a data subject, please refer to our complete Privacy Notice [\[link\]](#).

Contact details

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Commented [A2]: too ambiguous – can we put a time frame?

If you have any questions regarding this Privacy Notice, our processing of your personal data or if you wish to exercise your rights, please do not hesitate to contact us:

Verisure Arlo Europe DAC, Arlo Europe, company registration number 658538

Postal address: Building 4100, Cork Airport Business Park, Cork, Ireland, T22 AP97

Visiting address: Building 4100, Cork Airport Business Park, Cork, Ireland, T22 AP97

E-mail: dpo@verisure.com

Telephone: [...]

Website: www.arlo.com

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COMPLETE PRIVACY NOTICE

<p>1 GENERAL ►</p>	<p>▼ 1. GENERAL</p> <p>1.1 Your privacy is very important to Verisure Arlo Europe DAC, trading as Arlo Europe, registration number 658538 (“Arlo Europe”, “we”, “us”). Our mission is that you feel comfortable with us processing your personal data. The purpose of this Privacy Notice (“Privacy Notice”) is to explain how we ensure that your personal data is processed in compliance with applicable legislation.</p> <p>1.2 This Privacy Notice is applicable to all processing of personal data in relation to you as a current or potential customer and user of our products and services (“User”) and if you navigate or interact with our website www.arlo.com (“Website”), (“Website visitor”).</p> <p>1.3 If you as a User choose to process third parties’ personal data via our products and services, Arlo Europe will process their personal data and assume that you have previously informed them that we will process their personal data and that you have shared the contents of this Privacy Notice with them.</p>
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<p>2 DATA CONTROLLER AND DATA PROTECTION OFFICER ►</p>	<p>▼ 2. DATA CONTROLLER AND DATA PROTECTION OFFICER</p> <p>2.1 Arlo Europe is the data controller for the processing of your personal data and is thus responsible for ensuring that the processing of personal data complies with applicable legislation. You can find our contact details in the end of this Privacy Notice.</p> <p>2.2 The personal data which you capture by your Arlo devices belong to you and you are the data controller for such capture. In some situations, we may act as a data processor in terms of the content that you capture and record your device(s). We do not access your content for any other reason than for providing you with service at your request.</p> <p>2.3 Arlo Europe forms part of the Verisure group of affiliates (“Verisure” or the “Group”) and personal data is shared between the entities of Verisure. Any handling of personal for which an Verisure entity is the data controller will be explained in separate privacy notices made available when your personal data is first collected by that Verisure entity, for example where you or the business you work for engages Verisure to provide a service. You can find out more about our Group at www.verisure.com or by contacting us using the contact details in section 13.</p> <p>2.4 Arlo Europe have designated Rita Crowley as our Data Protection Officer (“Data Protection Officer”). The Data Protection Officer is inter alia responsible for monitoring that our processing of personal data is carried out in accordance with applicable legislation.</p> <p>2.5 The Data Protection Officer can be reached via the e-mail dpo@verisure.com.</p>
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<p>3 OUR PROCESSING OF PERSONAL DATA ►</p>	<p>▼ 3. OUR PROCESSING OF PERSONAL DATA</p> <p>3.1 Users:</p> <p>As a User of our services and products, we process your personal data for the purposes listed in Section 3.1.3 together with the following purposes:</p> <ul style="list-style-type: none"> • Administration and performance of contracts, • Provision of Arlo App which enables you to use our products and services, • Provide customer service and technical support in relation to our products and services, and • Training and quality assurance. <p>3.2 Website visitors:</p> <p>As a Website visitor, we process your personal data for the purposes listed in Section 3.1.3 together with the following purposes:</p> <ul style="list-style-type: none"> • To analyse the use of our Website and ensure functionality, and • To provide and administer our online shop. <p>3.3 Common for both Users and Website visitors:</p> <p>Regardless of being a User or Website visitor, we also process your personal data for the following purposes:</p> <ul style="list-style-type: none"> • Marketing, including individually targeted direct marketing, • Customer satisfaction surveys, customer reviews and business development, • Administration in connection with acquisitions, restructuring, etc., • Defending our legal interests in the event of a dispute, and • Complying with legal obligations, including sharing personal data with law enforcement or other authorities.
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3.3.1 More information about our processing of personal data is provided in the tables below, including information about why we process your personal data, what personal data we process to achieve those purposes and for how long we retain your personal data for each specified purpose.

PURPOSES

<u>Users</u>
Administration and performance of contracts ►
Provision of Arlo App which enables you to use our products and services ►
Provide customer service and technical support in relation to our products and services ►
Customer satisfaction surveys, customer reviews and business development ►
<u>Website visitors</u>
To analyse the use of our Website and ensure functionality ►
To provide and administer our online shop ►
<u>Common for both Users and Website visitors</u>
Marketing, including individually targeted direct marketing ►
Training and quality assurance ►
Administration in connection with mergers and acquisitions, restructuring, etc. ►
Defending our legal interests in the event of a dispute ►
Complying with legal obligations, including sharing personal data with law enforcement or other authorities ►

Users			
Administration and performance of contracts ►			
<p>▼</p> <p>What we do:</p> <p>We use your personal data to provide and administer your placed order(s) and purchase(s) of our products and services. We may also use your personal data to communicate with you, if necessary to provide and administrate your order(s) and purchase(s). Personal data relating to your shipping address is shared with different parcel services depending on your location. We will share your shipping and contact information for the purpose of shipping your order.</p>	<p>Categories of personal data:</p> <p><u>Contact details</u> such as first and last name, address, telephone number and e-mail address.</p> <p><u>Order and payment details</u> such as order history and payment details.</p>	<p>Legal basis:</p> <p><u>Performance of a contract.</u></p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>As the legal basis of this data processing is performance of a contract, you have the right to data portability.</p>	<p>Retention period:</p> <p>The personal data is retained for the duration of the contractual relationship and thereafter for a period which is necessary to handle statutory complaints from you regarding products and services. Personal data is processed in a customer service matter for as long as your matter is being handled and thereafter for up to [three (3) months].</p>

			Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.	
Provision of Arlo App which enables you to use our products and services ►				
	<p>▼</p> <p>What we do:</p> <p>In order to use our Products and Services, you need to register your Arlo camera in the Arlo App. You are the controller for the use of your Arlo cameras and the content you capture.</p> <p>Arlo Europe is the controller for the provision of the Arlo App. Arlo Europe may capture and either e-mail or send a push messages through our apps with portions of the video, depending on your preferences and settings. We can also analyse the data to identify motion or other events. Please</p>	<p>Categories of personal data:</p> <p><u>Contact details</u> such as first and last name, address, telephone number and e-mail address.</p> <p><u>Images and sounds of your own use of the Arlo Products and Services</u>, such as images, videos and audio that may include your personal data and the personal data of others if they are present in the monitored area.</p> <p><u>Device data</u>, such as IP address of the requesting device, data and time of</p>	<p>Legal basis:</p> <p><u>Performance of a contract.</u></p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p>	<p>Retention period:</p> <p>As a controller of the content which is visible to you via the Arlo App, you determine the retention period of the images and sounds of your own use of the Arlo Products and Services. The content is automatically erased after the end of the chosen Arlo plan or if you, at any time, decide to delete the data earlier, on that date. The data is not recoverable after deletion.</p>

	<p>note that the processing is done by artificial intelligence and not human monitoring centres.</p> <p>[...]</p>	<p>request, information about the operating system, online identifier and volume.</p>	<p>As the legal basis of this data processing is performance of a contract, you have the right to data portability.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	<p>The personal data, apart from the images and sounds of your content, is stored and used throughout the contractual relationship and up to [12 months] after the contractual relationship ends.</p>
<p>Provide customer service and technical support in relation to our products and services ►</p>				
	<p>▼</p> <p>What we do:</p> <p>We process your personal data when you get in contact with our customer service, for example regarding a problem with any of our products or services, if you want to ask questions about the products and services or if you wish to make a complaint.</p> <p>You have different ways to get in touch with us through our Website or apps. This includes</p>	<p>Categories of personal data:</p> <p><u>Contact details</u> such as first and last name, address, telephone number and e-mail address.</p> <p><u>Order and payment details</u> such as order history and payment details.</p>	<p>Legal basis:</p> <p><u>Performance of a contract.</u></p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we</p>	<p>Retention period:</p> <p>Personal data is processed in a customer service matter for as long as your matter is being handled and thereafter for up to [three (3) months].</p> <p>A recording of a incoming call is stored for up to 90 days.</p>

	<p>contacting our support by email or phone, or through the website.</p> <p>All incoming calls are recorded and stored in a secure third-party database, read more regarding this under the purpose Training and quality Assurance below.</p>	<p><u>Additional information</u> you provide in your communications with us.</p>	<p>erase personal data concerning you.</p> <p>As the legal basis of this data processing is performance of a contract, you have the right to data portability.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	
<p>Training and quality assurance ►</p>				
	<p>▼</p> <p>What we do:</p> <p>We process your personal data to analyse our products and services, for example based on customer surveys. The purpose of these analyses is to improve and develop our products and services, for example by enabling us to optimize our service offering. In order to offer you good customer service and technical support,</p>	<p>Categories of personal data:</p> <p><u>Contact details</u> such as first and last name, address, telephone number and e-mail address.</p> <p><u>Audio material</u> in the form of your incoming call between you and Arlo Europe.</p>	<p>Legal basis:</p> <p><u>Consent</u></p> <p>Before we start recording the incoming call to the customer care centre, we give you an option to consent to the recording of the phone call. If you do not actively consent to the recording, you may continue your phone call</p>	<p>Retention period:</p> <p>The personal data is stored and used throughout the contractual relationship and up to [12 months] after the contractual relationship ends.</p> <p>The recorded phone calls are stored for 90 days</p>

	<p>we at Arlo Europe work with continuous training of our staff. In the context of the training, we may process data about you as a User as we use examples from actual events in the training material to exemplify how the work should be conducted. However, if recorded conversations or other personal data appear in training material, it is always pseudonymised, which means that it is not possible to link the data directly to you without additional information.</p>	<p><u>Additional information</u> you provide in your communications with us.</p>	<p>without it being recorded. You may always withdraw your consent by contacting us.</p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	<p>unless you withdraw your consent earlier.</p>
<u>Website visitors</u>				
To analyse the use of our Website and ensure functionality ►				
<p>▼ What we do:</p>		<p>Legal basis:</p>	<p>Retention period:</p>	

	<p>We analyse and process your personal data to improve, develop, maintain and manage our website and service including to ensure website functionality. For these purposes, we also use third party tracking services that collect aggregated data about visitors to our websites. For more information about our use of cookies and similar technologies, please read our Cookie Policy here.</p>	<p>Categories of personal data:</p> <p><u>Usage data</u> such as cookie information and <u>behaviour on web site</u> such as browsing habits and visit history (<i>e.g.</i> which pages you have visited on our website and the duration of the visit).</p> <p><u>Device data</u> such as IP-number.</p>	<p>When processing personal data in the form of cookies which is necessary for the functioning of the website, we base such processing on our <u>legitimate interest</u>.</p> <p>However, when processing personal data in the form of non-essential cookies in order to analyse the use of our website we base the processing on your <u>consent</u>.</p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p>	<p>Please see our Cookie Policy for more information about for how long we process your information for this purpose.</p>
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			<p>As the legal basis of this data processing is <u>legitimate interest</u>, you have the right to object to processing of your personal data.</p> <p>You can change or withdraw your <u>consent</u> at any time by clicking on the cookie settings icon, which appears at the bottom right of our website. Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	
To provide and administer our online shop ►				
<p>▼</p> <p>What we do:</p> <p>Arlo Europe offers you the possibility to purchase its products and services via its own online shop. In order to complete the purchase and ensure that your order is sent</p>	<p>Categories of personal data:</p> <p><u>Contact details</u> such as first and last name, address, telephone number and e-mail address.</p>		<p>Legal basis:</p> <p><u>Performance of a contract.</u></p> <p>Your rights:</p> <p>You always have the right to request access to your</p>	<p>Retention period:</p> <p>The personal data is stored and used throughout the contractual relationship and up to [12 months]</p>

	to you, we process personal data such as payment details and contact details about you.	<u>Order and payment details</u> such as order history and payment details.	<p>personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>As the legal basis of this data processing is performance of a contract, you have the right to data portability.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	after the contractual relationship ends.
Common for both Users and Website visitors				
Marketing, including individually targeted direct marketing ►				
	<p>▼</p> <p>What we do:</p> <p>We process your personal data for marketing purposes,</p>	<p>Categories of personal data:</p>	<p>Legal basis:</p> <p><u>Legitimate interest</u> as we assess that our interest in</p>	<p>Retention period:</p> <p>For you as <u>our</u> User: the personal data is stored</p>

Commented [A5]: Arlo keeps data inside PEGA for 2 years. In the case of users ending the relationship we could keep the data up to 2 years.

	<p>including for the purpose of market segmentation. Our marketing measures may consist of newsletters, information about new products, special offers or competitions.</p> <p>Market segmentation entails that we target our marketing towards specific segments of our customer base. <u>The segmentation is based on demographic selection criteria such as age, gender, marital status, or place of residence.</u></p> <p>Segmented marketing measures are not targeted on the basis of individual customers but rather the relevant segments of our customer base.</p> <p>If you wish to receive individually targeted marketing, which is personalised based on your individual preferences, you may consent to such targeted marketing. Targeted marketing may entail, for example, that</p>	<p><u>Contact details</u> such as name, address, telephone number and e-mail address.</p> <p><u>Browsing habits and visit history</u> such as which pages you have visited on our (and others') website and the duration of the visit.</p> <p><u>Order and payment details</u> such as order history and payment information.</p> <p><u>Demographic information</u> such as age, gender, marital status, address and education.</p>	<p>sending general and segmented marketing to you outweighs your interests or fundamental rights and freedoms requiring protection of personal data. We ensure that the regulatory requirements for marketing via electronic messages are fulfilled.</p> <p><u>Consent</u> is the legal basis for processing of personal data for the purposes of individually targeted marketing.</p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p>	<p>and used throughout the contractual relationship and up to [12 months] after the contractual relationship ends assuming that you have not objected to our direct marketing before that.</p> <p><u>For those who are not yet our User:</u></p> <p>We retain your personal data for direct marketing purposes for [3 months] from receiving your contact details, assuming that you have not objected to our direct marketing before that.</p> <p>We will seize with individually targeted marketing immediately if you withdraw your consent.</p> <p>If you choose to become a User, the conditions set out under the heading</p>
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Commented [A6]: We don't store data of people that are not our users. There is nothing like newsletter targeting nonusers.

Commented [A3]: We don't use this data for segmentation. Segmentation is primarily based on usage, Arlo products, place of residence

Commented [A4]: We don't collect except the address

	<p>we analyse your use of our services and products such as when you usually make purchases and tailor our marketing measures based on such individual insights. We may also analyse your browsing habits on our and others' websites, in our app as well as your transaction history for the purposes of targeted marketing.</p>		<p>As the legal basis of this data processing is <u>legitimate interest</u>, you have the right to object to processing of your personal data.</p> <p>When we process your personal data based on your <u>consent</u>, you have right to withdraw your consent at any time.</p> <p>If you do not want to receive direct marketing from us, you can object to processing of your personal data at any time.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	<p>"For you as our User" will apply.</p>
<p>Customer satisfaction surveys, customer reviews and business development ►</p>				
	<p>▼</p> <p>What we do:</p> <p>We use your personal data, such as data derived from</p>	<p>Categories of personal data:</p>	<p>Legal basis:</p> <p><u>Legitimate interest</u> as we assess that our interest in</p>	<p>Retention period:</p> <p>The personal data is stored and used</p>

	<p>statistical compilations, market segmentations and customer satisfaction surveys, for the purposes of conducting market and customer analyses. The results of our analyses are used for improving, replacing and developing new products and services, processes or working methods with the goal of developing our business and constantly improving in meeting our Users' expectations and needs. For example, we may process your personal data to offer new solutions or to adapt our website and/or app in accordance with our Users' preferences.</p> <p>We always pseudonymise, and if possible anonymise, the personal data we process to the greatest extent possible for achieving the purpose of the processing.</p>	<p><u>Contact details</u> such as name, telephone number, postal address and e-mail address.</p> <p><u>Purchasing patterns</u> such as information about how you use our services and your buying patterns (e.g. during which months/days during the week you usually use our services).</p> <p><u>Order and payment details</u> such as order history and payment information.</p> <p><u>Demographic data</u> such as age, gender, marital status, address and education.</p> <p><u>Usage data</u> such as cookie information and <u>behaviour on web site</u> such as browsing habits and visit history (e.g. which pages you have visited on our website and the duration of the visit).</p>	<p>developing our business to better meet our Users' expectations and needs outweighs your interests or fundamental rights and freedoms requiring protection or personal data.</p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>As the legal basis of this data processing is <u>legitimate interest</u>, you have the right to object to processing of your personal data.</p> <p>Information about what these rights entail in</p>	<p>throughout the contractual relationship and up to [12 months] after the contractual relationship ends.</p>
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Commented [A7]: We don't collect except address

		<p><u>Additional information</u> you provide us in for example customer surveys.</p>	<p>practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	
<p>Administration in connection with mergers and acquisitions, restructuring, etc. ►</p>				
	<p>▼</p> <p>What we do:</p> <p>If Arlo Europe is to be restructured, e.g. divided into several different businesses, or if a third party acquires Arlo Europe or our customer database, Arlo Europe will disclose your personal data and that of other customers to the acquiring company. That company will continue to use your personal information for the same purposes as those stated in this Privacy Notice, unless you are informed otherwise in connection with the transfer.</p>	<p>Categories of personal data:</p> <p><u>Contact details</u> such as name, telephone number and e-mail address.</p> <p><u>Order and payment details</u> such as purchase and transaction history.</p>	<p>Legal basis:</p> <p><u>Legitimate interest</u> as we assess that our interest in enabling an acquisition or restructuring process, assuming that the acquiring company carries out similar operations as Arlo Europe, outweighs your interests or fundamental rights and freedoms requiring protection of personal data.</p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p>	<p>Retention period:</p> <p>If Arlo Europe ceases to exist, e.g. through a merger, liquidation or bankruptcy, or if Arlo Europe's customer database is transferred to an acquiring company, we will erase the personal data as long as the retention of such personal data is not required by law. In such case, your personal data will be processed in accordance with this Privacy Notice.</p>

			<p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>As the legal basis of this data processing is <u>legitimate interest</u>, you have the right to object to processing of your personal data.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	
Defending our legal interests in the event of a dispute ►				
	<p>▼</p> <p>What we do:</p> <p>In the event of a dispute, such as a payment dispute, we have the right to use your data for the purpose of establishing,</p>	<p>Categories of personal data:</p> <p>All categories of personal data listed in this Privacy Notice.</p>	<p>Legal basis:</p> <p><u>Legitimate interest</u> as we assess that our interest in defending our interests in the event of a dispute outweighs your interests or fundamental rights and</p>	<p>Retention period:</p> <p>The personal data is retained as long as they are needed to establish, defend or enforce a legal claim, for example in the event of a dispute over</p>

	defending or enforcing the legal claim.		<p>freedoms requiring protection of personal data.</p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>As the legal basis of this data processing is <u>legitimate interest</u>, you have the right to object to processing of your personal data.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this Privacy Notice.</p>	payment, however a maximum of 3 years.
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Complying with legal obligations, including sharing personal data with law enforcement or other authorities ►			
	<p>What we do:</p> <p>We may process your personal data to comply with our legal obligations under applicable law, e.g., legislation regarding accounting, audit and tax.</p> <p>In some jurisdictions sharing of personal data with law enforcement or other authorities may not constitute a legal obligation. We may share personal data even in the absence of legal obligation if we consider it is important for the purpose of prevent or investigate crime.</p>	<p>Categories of personal data:</p> <p>All categories of personal data listed in Section 3 above.</p>	<p>Legal basis:</p> <p><u>Compliance with a legal obligation.</u></p> <p>Your rights:</p> <p>You always have the right to request access to your personal data and that we rectify your personal data if it is incorrect.</p> <p>You may also have right to request that we restrict the processing of your personal data and that we erase personal data concerning you.</p> <p>Information about what these rights entail in practice and how you can exercise your rights is found in Section 9 of this privacy notice.</p> <p><u>Legitimate interest if the sharing does not constitute a legal obligation</u> as we assess</p>

			that our interest in providing proportional assistance to competent authorities outweighs your interests or fundamental rights and freedoms requiring protection of personal data.	
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<p>4 COLLECTION OF PERSONAL DATA ►</p>	<p>▼ 4. FROM WHERE DO WE COLLECT YOUR PERSONAL DATA</p> <p>4.1 Users: [We receive the personal data we process from you. We do not collect personal data from other sources.] alternatively [We receive the personal data we process from different sources. In addition to the personal data which you provide us with, we also collect personal data concerning [...] from public registers, our partners and [...].]</p> <p>4.2 Website visitors: We receive the personal data we process from you. We do not collect personal data from other sources.] alternatively [We receive the personal data we process from different sources. In addition to the personal data which you provide us with, we also collect personal data concerning [...] from public registers, our partners and [...].]</p> <p>4.3 It is necessary that you provide certain personal data to us at Arlo Europe in order to enter into an agreement with us and for us to provide our products and services to you. In case you do not provide us with the necessary personal data, it is not possible for us to provide our products or services to you and thus enter into an agreement with you.</p>
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<p>5</p> <p>AUTOMATED DECISION-MAKING, INCLUDING PROFILING ►</p>	<p>▼ 5. AUTOMATED DECISION-MAKING, INCLUDING PROFILING</p> <p>5.1 We do not use automated individual decision-making.</p> <p>5.2 However, we do use profiling for data analysis and market research, which means that we perform an automated form of processing of your personal data for evaluating personal aspects or make predictions about you. In particular, we pursue the purpose of dividing our customers and interested parties into different target and user groups in the context of market research (User segmentation), for insights into different target groups and their respective usage habits and interests, demographics and the marketing of these findings in the context of advertising services provided to third parties. We also use personal data to administer customer relations, for example to handle customer service matters, price adjustments and customer satisfaction surveys.</p> <p>5.3 The purpose of our profiling and the types of personal data being processed for each profiling is described in detail in Section 3 above. None of the aforementioned processing results in significant or legal decisions being made about you on a wholly automated basis.</p> <p>5.4 If you have any questions regarding the profiling, please do not hesitate to contact us. You will find our contact details in Section 13 below. If you do not wish us to use profiling for the purpose of providing individually targeted direct marketing, you always have the right to object to such processing by contacting us. We will cease to use your personal data for that purpose when we have received your objection.</p>
<p>6</p> <p>RETENTION OF PERSONAL DATA ►</p>	<p>▼ 6. RETENTION OF PERSONAL DATA</p> <p>6.1 We will only retain your personal data for as long as it is needed for the purposes we collected the personal data and as described in this Privacy Notice. When we no longer need your personal data we will remove the personal data from your systems and databases, including any back-ups. More specific retention periods are provided in the tables above in Section 3, under the heading “Retention period”.</p>

<p>7 WITH WHOM DO WE SHARE YOUR PERSONAL DATA? ►</p>	<p>▼ 7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA</p> <p>7.1 We may share your personal data with reliable external parties, such as to other group companies, IT providers and companies with whom we partner to provide our services. We may also need to disclose personal data at the request of public authorities or to other parties in the context of court proceedings, mergers and acquisitions or similar. In the tables below, you will find information about which external parties we may disclose personal data to and which categories of personal data will be disclosed in such case.</p> <table border="1"> <thead> <tr> <th data-bbox="622 531 1061 579">We may share your data with:</th> <th data-bbox="1061 531 1635 579">Categories of personal data that are shared:</th> </tr> </thead> <tbody> <tr> <td data-bbox="622 579 1061 627">Companies belonging to the Verisure Group</td> <td data-bbox="1061 579 1635 627">[...]</td> </tr> <tr> <td data-bbox="622 627 1061 778">Arlo Inc. which provides the our platform for the Arlo Services-</td> <td data-bbox="1061 627 1635 778">[...] [Video material, Arlo account information, purchase history and other personal data provided through the platform]; [Fill in]</td> </tr> <tr> <td data-bbox="622 778 1061 946">Outsourced Customer support</td> <td data-bbox="1061 778 1635 946">[...] [Contact information such as name, email address, telephone number, and postal address, purchase history data]; [Fill in]</td> </tr> <tr> <td data-bbox="622 946 1061 1114">Billing providers such as billing systems in order to send out and manage invoices-</td> <td data-bbox="1061 946 1635 1114">[...] [Contact information such as name, email address, telephone number, and postal address, social security number, purchase history data]</td> </tr> <tr> <td data-bbox="622 1114 1061 1249">Software providers such as cloud-service providers, platform providers, and data analysts to manage our website, IT systems and store our technical data</td> <td data-bbox="1061 1114 1635 1249">[...] [Device data such as IP address, Arlo account information, purchase history data]</td> </tr> <tr> <td data-bbox="622 1249 1061 1326">Sales support providers such as marketing platforms and sales systems</td> <td data-bbox="1061 1249 1635 1326">[...]</td> </tr> </tbody> </table>	We may share your data with:	Categories of personal data that are shared:	Companies belonging to the Verisure Group	[...]	Arlo Inc. which provides the our platform for the Arlo Services-	[...] [Video material, Arlo account information, purchase history and other personal data provided through the platform]; [Fill in]	Outsourced Customer support	[...] [Contact information such as name, email address, telephone number, and postal address, purchase history data]; [Fill in]	Billing providers such as billing systems in order to send out and manage invoices-	[...] [Contact information such as name, email address, telephone number, and postal address, social security number, purchase history data]	Software providers such as cloud-service providers, platform providers, and data analysts to manage our website, IT systems and store our technical data	[...] [Device data such as IP address, Arlo account information, purchase history data]	Sales support providers such as marketing platforms and sales systems	[...]
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Sales support providers such as marketing platforms and sales systems	[...]														

Commented [A8]: With regards to Telco partners, do we need to specify who these partners are?

Commented [A9]: With Telco, if there is a contract in place for a sim card, will the telco provide a privacy document? EG sim card bought with Go2 etc

Commented [A10R9]: The billing for the sim card will be via telco but for a prepaid Secure plan - how will that work?

			[Data derived from the use of cookies, such as device identifiers, location data, IP addresses]
		Parcel delivery service providers	[...] [Contact information such as name, email address, telephone number, and postal address, purchase history data]
		Authority or equivalent third party in connection with audits, court proceedings or other similar purposes. This is in order to comply with legal obligations and to protect our legal interests in the event of a dispute.	All categories of personal data.
		The acquirer or other successor in the event of mergers, divestments, restructuring, reorganization, dissolution and other sale or transfer of Verisure's assets.	All categories of personal data.
	7.2	We will not sell your personal data to any other party.	

<p>8</p> <p>WHERE IS YOUR DATA PROCESSED? ►</p>	<p>▼ 8. WHERE IS YOUR DATA PROCESSED?</p> <p>8.1 We aim to always process your personal data in the EU/EEA. In some circumstances we may need to transfer your personal data to a country outside of the EU/EEA (“Third Country”). In case your personal data is transferred to a Third Country, we will ensure that your personal data will continue to be subject to an essentially equivalent level of protection as in the EU/EEA.</p> <p>8.2 We transfer your personal data to recipients in United Kingdom and Switzerland which are subject to EU Commission’s adequacy decision. This means that the EU Commission has assessed that the level of data protection in this country is essentially equivalent to that of the EU/EEA and that it is therefore possible to transfer personal data to such country without additional safeguards.</p> <p>8.3 When we transfer personal data to a Third Country which is not subject to an adequacy decision, we apply a relevant transfer mechanism, that is applicable safeguard to ensure that an essentially equivalent level of data protection is ensured in the Third Country, specified in the table below.</p> <table border="1" data-bbox="622 774 1635 874"> <tr> <td>Country outside of the EU/EEA:</td> <td>Appropriate safeguards:</td> </tr> <tr> <td>USA</td> <td>Standard Contract Clauses.</td> </tr> </table> <p>8.4 Please contact us for more information about the legal basis for a specific transfer or if you want to receive a copy of the relevant transfer mechanism or information about the security measures taken in the context of the transfer. The contact details are provided in the end of this Privacy Notice (Section 13).</p>	Country outside of the EU/EEA:	Appropriate safeguards:	USA	Standard Contract Clauses.
Country outside of the EU/EEA:	Appropriate safeguards:				
USA	Standard Contract Clauses.				

Commented [A11]: Do we need to inform the users if and when this could happen?

Commented [A12]: I see this takes care of my comment above

<p>9 YOUR RIGHTS ►</p>	<p>▼ 9. YOUR RIGHTS</p> <p>9.1 Our responsibility for your rights ►</p> <p>▼</p> <p>9.1.1 In our capacity of a data controller, we are responsible for ensuring that your personal data is processed in compliance with applicable legislation and that you can effectively exercise your rights as a data subject. You may contact us at any time if you wish to exercise your rights. You will find the contact details in the end of this Privacy Notice.</p> <p>9.1.2 We have an obligation to respond to your requests to exercise your rights within one month from receiving your request. If your request is complex or if we have received many requests, we have the right to extend this deadline by two more months. If we are unable to take the action you have requested within one month, we will inform you of the reason for the delay and of your right to lodge a complaint with a supervisory authority and to seek a judicial remedy.</p> <p>9.1.3 You will not be charged for any information, communication or measures that we implement. However, if your request is manifestly unfounded or excessive, we may charge an administrative fee for providing the information or taking the action requested or refuse to act on your request altogether.</p> <p>9.2 Your right to access, rectification, erasure and restriction ►</p> <p>▼</p> <p>9.2.1 You have the right to request:</p> <p>a) <u>Access to your personal data</u>. This means that you have the right to request access to personal data that we hold about you. You also have the right to be provided, at no cost, with information about which personal data we are processing about you. We have the right to charge a reasonable administration fee if you request further copies. If you make a request by electronic means, e.g. via email, we will provide you with the information in commonly used electronic format.</p> <p>b) <u>Rectification of your personal data</u>. At your request or on our own initiative, we will correct, anonymise, delete or complete data that we know to be inaccurate, incomplete or misleading. Also, you have the right to complete any incomplete personal data if something relevant is missing.</p>
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	<p>c) <u>Erasure of your personal data.</u> You have the right to request that we erase your personal data if there is no compelling reason for us to continue processing the data. Compelling reasons for use to continue processing may be:</p> <ul style="list-style-type: none"> i. Processing is necessary for the right of freedom of expression and information, ii. Processing is necessary to comply with a legal obligation, iii. Processing is necessary for reasons of public interests in the area of public health, iv. Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes or v. Processing is necessary for the establishment, exercise or defence of legal claims. <p>Your personal data will be erased if none of the circumstances above are applicable and if</p> <ul style="list-style-type: none"> i. The personal data is no longer needed for the purpose for which we collected them, ii. We process your personal data based on your consent and you withdraw your consent, iii. You object to us processing your personal data which is based on a legitimate interest assessment, and we have no compelling interests that overrides your interests or rights and freedoms, iv. We have processed the personal data unlawfully or v. We have a legal obligation to erase the personal data. <p>d) <u>Right to restrict processing.</u> This means that we temporarily restrict the processing of your data. You have the right to request restriction when:</p> <ul style="list-style-type: none"> i. you consider your data to be inaccurate and you have requested rectification as defined in paragraph 9.2.1 b), while we establish the accuracy of the personal data, ii. the processing is unlawful, and you do not want the data to be erased, iii. as the personal data controller, we no longer need to process the personal data for our processing purposes, but you need them to be able to establish, exercise or defend a legal claim, or
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	<p>iv. you have objected to processing as defined in paragraph Error! Reference source not found. while waiting for our assessment of whether our legitimate interests override yours.</p> <p>9.2.2 We will take all reasonable measures possible to notify everyone who has received personal data as stated in Section 7 above if we have rectified, erased or restricted access to your personal data after you have requested us to do so. At your request, we will provide you with more information about the recipients of your personal data.</p> <p>9.3 Your right to object to processing ▶ ▼</p> <p>9.3.1 You have the right to object to the processing of your personal data if our processing is based upon legitimate interest or performance of a task carried out in the public interest (see Section 3 above). If you object to such processing, we will only continue to process your data if we have compelling reasons for doing so that override your interests or rights and freedoms or if the processing is necessary for the establishment, exercise or defence of legal claims.</p> <p>9.3.2 If you do not wish that we use your personal data for direct marketing purposes, you always have the right to object to such processing by contacting us. We will cease to use your personal data for that purpose when we have received your objection.</p> <p>9.4 Your right to withdraw consent ▶ ▼</p> <p>If we process your personal data based on your consent as the legal basis, you always have the right to withdraw your consent. You can do this at any time by contacting us. Our contact details are found in the end of this Privacy Notice.</p> <p>9.5 Your right to data portability ▶ ▼</p>
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Commented [A13]: This implies that we are auto enrolled - I thought under GDPR we had to give express opt in.?

	<p>9.5.1 You have right to data portability when we process your personal data by automated means and when the legal basis for the processing is your consent or performance of a contract.</p> <p>9.5.2 Right to data portability means that you have the right to receive the personal data we process about you in machine-readable format which allows you to transfer these personal data to another data controller. You may also request us to transfer the personal data directly to another data controller.</p> <p>9.6 Your right to complain to the supervisory authority ►</p> <p>▼</p> <p>You have the right to lodge a complaint with the Data Protection Authority in your home Member State if you are not satisfied with our processing of your personal data.</p>
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<p>10 WE PROTECT YOUR PERSONAL DATA ►</p>	<p>▼ 10. WE PROTECT YOUR PERSONAL DATA</p> <p>We are committed to ensuring that you always feel comfortable when providing your personal data to us. We have therefore implemented both technical and organisational security measures, including access restrictions and regular internal controls, to best protect your personal data against, for example, unauthorised access, alteration or loss. Should a data breach that materially impacts you or your personal data, e.g. entailing risk of fraud or identity theft, occur, we will contact you to explain what has happened and to provide you with advice on how you can mitigate any potential adverse effects of such data breach relevant for you.</p>
<p>11 COOKIES ►</p>	<p>▼ 11. COOKIES</p> <p>We cookies and similar technologies ("cookies") on our website and app in order to, inter alia, improve your experience with us and to simplify and adapt our website to your needs and preferences. If you would like to know more about our use of cookies, please refer to our Cookie Policy here.</p>
<p>12 CHANGES TO THIS PRIVACY NOTICE ►</p>	<p>▼ 12. CHANGES TO THIS PRIVACY NOTICE</p> <p>12.1 <i>This Privacy Notice was updated in February 2023.</i></p> <p>12.2 We have the right to change this Privacy Notice at any time. The latest version of the notice will always be available on our website.</p> <p>12.3 When we make changes that are not purely linguistic or editorial, you will be notified of the changes within a reasonable time prior to the changes taking effect. If you do not agree to the changes, you have the right to object to the processing before the changes take effect.</p>

<p>13 CONTACT DETAILS ►</p>	<p>▼ 13. HOW TO CONTACT US</p> <p>Our Data Protection Officer acts as the main point of contact for all matters relating to our Privacy Notice. The Data Protection Officer or the local contact person can be contacted by email at dpo@verisure.com.</p> <p>If you have any complaints or questions about how we use your personal data, please do not hesitate to contact us:</p> <p>Verisure Arlo Europe DAC, Arlo Europe, company registration number 658538</p> <p>Postal address: Building 4100, Cork Airport Business Park, Cork, Ireland, T22 AP97</p> <p>Visiting address: Building 4100, Cork Airport Business Park, Cork, Ireland, T22 AP97</p> <p>Telephone number: [...]</p> <p>E-mail: dpo@verisure.com</p> <p>Website: www.arlo.com</p>
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