

WIZ PRIVACY NOTICE

Last updated: September 2023 - [See previous versions.](#)

This Privacy Notice will help you understand who we are, what personal data we collect about you, why we collect it, and what we do with it. When you use our products and services or when you interact with us, we may be processing your personal data.

Our approach to respecting your privacy is based on the following principles:

- We do not sell your personal data.
- We only collect the personal data that we need, when we need it, and for as long as we need it.
- We are transparent and offer you meaningful choices.

1. [Who are we?](#)
2. [When does this Privacy Notice apply?](#)
3. [What types of personal data do we collect?](#)
4. [How do we use your personal data?](#)
5. [What is the legal basis for our use of your personal data?](#)
6. [How long do we keep your personal data?](#)
7. [When do we share your personal data?](#)
8. [How do we transfer your personal data abroad?](#)
9. [How do we secure your personal data?](#)
10. [What are your privacy rights?](#)
11. [Do we collect personal data from children?](#)
12. [What are your responsibilities?](#)
13. [Changes to this Privacy Notice](#)
14. [Cookies and similar tracking technologies](#)
15. [How to contact us](#)
16. [Country-specific Privacy Notices](#)

WHO ARE WE?

Signify is the company that develops WiZ products and services under the WiZ brand. Signify is a global lighting organization with recognized expertise in the development, manufacturing, and application of innovative lighting products, systems, and services.

When this Privacy Notice mentions “we,” or “us,” it refers to the [Data Controller](#); the Signify affiliate with which you had, have, or will have a relationship or that otherwise decides which of your personal data are collected and how they are used, as well as **Signify Netherlands B.V.** (Registration number 17061150 - High Tech Campus 48, 5656 AE, Eindhoven, the Netherlands). Please note that the Signify affiliates include the [subsidiary companies in which Signify N.V. has control](#), either through direct or indirect ownership.

We protect your personal data in line with our [Binding Corporate Rules \(“Signify Privacy Rules”\)](#).

[Top of page ↑](#)

WHEN DOES THIS PRIVACY NOTICE APPLY?

This Privacy Notice covers the personal data processed in your interaction with WiZ and its products and services. For example, it covers the following:

- when you visit or use our websites, applications, or social media channels.
- when you buy our products or services directly from our WiZ webshop.

- when you use a WiZ product, service, or application.
- when you subscribe to our marketing communications or marketing initiatives.
- when you contact or interact with our consumer care team.
- when you sign-up for a WiZ Beta Program.
- when you use WiZ for Business.

If you are a resident of the [United States of America](#), this Privacy Notice is supplemented by a Country Specific Privacy Notice, which also applies to you.

If you have a direct relationship with us but do not fall within the scope of this WiZ Privacy Notice, your personal data will be governed by a different Signify Privacy Notice which is accessible in our [Signify Privacy Centre](#).

This Privacy Notice only applies to you in case we are the Data Controller for the processing of your personal data. In case we are acting as a [Data Processor](#), the Privacy Notice of the Data Controller will govern the processing of your personal data.

Please keep in mind that since we are an international company, this Privacy Notice may be replaced or supplemented to fulfill local legal requirements, as well as to provide you with additional information on how we process your personal data through specific WiZ products, services, systems, or applications.

[Top of page ↑](#)

WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

Depending on how you interact with us and what products or services you use, or how you use them, we process different personal data about you.

[Top of page ↑](#)

IF YOU USE OUR WIZ PRODUCTS OR SERVICES

Data Source	Personal data being used
WiZ consumer App: Sign-in Data	If you decide to sign in, the following identifiers are processed: <ul style="list-style-type: none"> • Unique Social Account ID. This ID is a unique string of data that does not directly identify you. Other Data, such as the Required Data mentioned below are connected to this ID.
WiZ consumer App: Required Data	For the WiZ products and services run as intended and work reliably and securely, some information about your WiZ ecosystem and mobile application is automatically shared with us: <ul style="list-style-type: none"> • Information on the mobile application and WiZ installed products (including device configuration data), unique user and device identifiers, external IP address, system error, and crash information.
WiZ consumer App: Optional Data	For product and service improvement, personalization of the services, or our marketing efforts, optional analytic information is shared with us. When required, we will ask for your prior consent to capture this data. <ul style="list-style-type: none"> • Information on the use of the mobile application, services, installed products, and unique user and device identifiers.
WiZ Pro (for Business)	Only if you are a WiZ Pro user:

	<ul style="list-style-type: none"> We may ask you for your full name and email address for login authentication purposes. Optionally, you can also provide us with the building address and phone number.
WiZ Beta Program	<p>We collect additional personal data of users who choose to join our Beta programs.</p> <ul style="list-style-type: none"> This includes full name, postal address, unique user and device identifiers, and contact information.

[Top of page ↑](#)

IF YOU PURCHASE A PRODUCT OR SERVICE FROM US

Data Source	Personal data being used
Purchase and return pages	Product or service subscription information, order information such as contact details, shipment and invoice address, invoice information and history, and payment status. We do not capture, store, or have access to any banking or credit card information other than the general payment status (payment successful, payment declined or payment on hold). If applicable, we also process return or exchange information.

[Top of page ↑](#)

IF YOU INTERACT WITH US

Data Source	Personal data being used
Website technologies	Websites you visit or links you click in our marketing e-mails or similar communication channels.
Contact Forms, Marketing Forms, and similar Forms.	<p>If you submit a contact form or sign up for our newsletters or marketing offers, we may process certain personal data about you. We may collect the following personal data:</p> <ul style="list-style-type: none"> Your name and contact details.
Customer Care	<p>We use personal data to provide you with consumer support, respond to your inquiries, fulfill your requests, and provide you with related consumer service. We may also use this personal data to improve and customize our products and their functionalities and to train our consumer care employees.</p> <p>When you contact our consumer support, or when you communicate with one of our consumer care representatives by email, phone, social media channels, or similar, we may process the following personal data:</p> <ul style="list-style-type: none"> The recording of the call if you have provided your prior consent when required. Your questions or requests that you made. The status of the request. Any Data Source available to us if these are necessary to provide consumer support. <p>Exceptionally and where needed for product security, product replacement, recalls or other related reasons, we may ask you to provide your contact information. In these cases, this contact information may only be used for the aforementioned purposes.</p>
Reviews and feedback	<p>We use this personal data to provide us and other users with insights into the value of our products and services.</p> <p>When you use this functionality, we may process the following personal data:</p> <ul style="list-style-type: none"> Your comments and reviews. Your name.

Promotions, Sweepstakes, and competitions	<p>We use this personal data to allow you to register in a competition, to avoid fraud, to provide the prize, and for marketing communications in case you have consented to these.</p> <p>If you choose to take part in our competitions, depending on your choices or the competition requirements, we collect the following personal data:</p> <ul style="list-style-type: none"> Your name, contact information, postal address, date of birth, and other information as necessary or as required by the terms of the competition.
Social listening	<p>We use this personal data to obtain an overall view of people’s perceptions of us and our brand and to resolve problems regarding our products and product functionalities.</p> <p>When you interact or communicate on social media in a public manner, your personal data is processed by a third party that provides social listening services to us.</p> <p>The personal data collected includes, depending on what you choose to make public, information such as name, interests, comments, and content you have posted/shared.</p>
User Generated Content	<p>If you have agreed to it, we may use the content you have published online (such as pictures or videos you may have taken which contain WiZ products) to showcase them to the public on any of our channels.</p> <p>The personal data processed depends on the information that you have made public. The personal data collected may include information such as username, and comments or content you have posted.</p> <p>Please remember that the content you have agreed to provide to us can be viewed by the public, and, as such, before agreeing, you should review if you are comfortable sharing any personal data that may be made public.</p>
Third parties	<p>In addition to our websites, apps, and other digital channels, we may also use other sources to obtain information about you, such as social media platforms, joint marketing partners, or other suppliers of products and functionality that complement the WiZ ecosystem, such as suppliers of voice assistant functionality.</p> <p>Which personal data is processed depends on your choices and the third parties involved. If you would like to receive specific information about this, please contact us.</p>

[Top of page ↑](#)

HOW DO WE USE YOUR PERSONAL DATA?

We use your personal data to provide you with a secure, reliable, and personalized experience with our WiZ products and services. We may also improve our products based on your feedback, provide customer support, or engage in personalized marketing communications, amongst others.

Purposes	Examples
Providing the service, conclusion, and execution of agreements	<ul style="list-style-type: none"> This purpose includes the use of personal data in connection with the conclusion and execution of agreements with you and includes activities such as sales, billing (incl. settlement of payment transactions), shipment of products or services, registration on mobile applications or websites, warranty, transactional, service, or legal communications, account management, as well as the provision of essential product functionalities. Processing your personal data when requested or consented by you.
Providing personalized support including replying to a query	<ul style="list-style-type: none"> This purpose includes providing personalized support via communication channels, such as consumer care. You may be able to call, chat, or send us messages via social networks.

Relationship management, personalized communications, and (direct) marketing	<ul style="list-style-type: none"> • This purpose includes the use of personal data in connection with activities such as maintaining and promoting contact, external communications, account management, product recalls, execution and analysis of market surveys and marketing strategies, and execution of direct marketing communications. • Providing a personalized experience by presenting products and offers tailored to your preferences, interests, or profile through personalized emails, messages, or ads, which are presented through different digital touchpoints such as email, our mobile applications, or social media channels.
Product and service personalization	<ul style="list-style-type: none"> • This purpose includes personalizing our products, services, and functionalities by tailoring them to your preferences and interests (such as personalization on our websites or applications).
Product and service improvement and development	<ul style="list-style-type: none"> • This purpose includes improving the products, services, product functionality, communications, or mobile applications and developing innovative technologies or functionalities. • Sending survey communications for market research purposes. We only send you these types of communications with your prior consent unless this is not required under applicable law.
Compliance with legal obligations	<ul style="list-style-type: none"> • This purpose includes the use of personal data in connection with the performance of a task carried out to comply with a legal obligation to which we are subject, including the disclosure of personal data to government institutions or supervisory authorities, including tax authorities and other competent authorities for the sector in which we operate. In case of a request from an authority to disclose the personal data of our consumers, we will follow our WIZ Agency Disclosure Requests notice.
Defense of legal claims	<ul style="list-style-type: none"> • This purpose includes the use of personal data in connection with activities such as preventing, preparing for, or engaging in dispute resolution.
Security and protection of our interests/assets	<ul style="list-style-type: none"> • This purpose includes the use of personal data in connection with the security and protection of our interests and/or assets and our consumers, business customers, and business partners, including the safeguarding of the security and integrity of their business sector. In particular, it includes activities such as detecting, preventing, investigating, and combating (attempted) fraud, criminal or objectionable conduct directed against us, our employees, or customers (including the use of and participation in our incident registers and sector warning systems), activities such as those involving health and safety, authentication of customer, supplier or business partner status and access rights (such as required screening activities for access to our premises or systems), and activities such as deploying and maintaining technical and organizational security measures.
Assessment and (re)screening of (potential) customers, suppliers, and/or business partners (WIZ Pro)	<p>This purpose includes the use of personal data in connection with the assessment and acceptance of certain third parties (such as consumers, business customers, suppliers, and business partners), including confirming and verifying the identity of relevant Individuals (which may include the use of a credit reference agency or other third parties), conducting due diligence and screening against publicly available government and/or law enforcement agency sanction lists and other third-party data sources, using and participating in our incident registers and sector warning systems and/or third-party verification services.</p>
Business process execution, internal management, and management reporting	<p>This purpose includes the use of personal data in connection with activities such as management of company assets (including IT systems and infrastructure), finance and accounting, credit assessment (including setting credit limits) and risk management, conducting (internal) audits and investigations, implementing business controls, provision of central personal data facilities for efficiency purposes, management of alliances, ventures, mergers, acquisitions, and divestitures, reorganizations or disposals and integration with purchaser, management reporting and analysis, archive and insurance purposes, legal or business consulting, government and legal affairs, and intellectual property management.</p>

HOW DO WE USE YOUR PERSONAL DATA FOR PERSONALIZED COMMUNICATIONS, MARKETING, AND PRODUCT/SERVICE PERSONALIZATION?

With your prior consent or when allowed by applicable law, we may send you tailored direct marketing communications about our products, services, events, and promotions. We may contact you via different channels such as email, our websites, mobile applications, or through third parties such as social media or other publishers.

We can tailor the communications to your preferences and behavior and provide you with a personalized experience by way of analyzing and combining the personal data associated with you. In essence, we strive to make our products and their functionalities contextualized to respond to your preferences and needs. We are aiming to provide smarter and more enriching experiences.

We may also collect and use measurements deriving from these communications to create segments of our audience showing which of our products and services users are interested in and track the success of our marketing efforts.

We may use your personal data to invite you for consumer feedback or market research campaigns as we are constantly working to improve our products and services and to make them more in line with what consumers want. We only send you these types of communications with your prior consent unless this is not required under applicable law.

If at any moment you decide that you no longer want to receive these personalized communications, you can always unsubscribe from them. To unsubscribe, you can click on the unsubscribe button found at the end of every marketing communication we send or [contact us](#), and we will do this for you.

Please note that even if you opt-out from receiving marketing communications, you may still receive administrative, service, or transactional communications from us, such as technical and/or security updates of our products, order confirmations, notifications about your account activities, and other important notices. You cannot unsubscribe from these types of communications.

[Top of page ↑](#)

WHAT IS THE LEGAL BASIS FOR OUR USE OF YOUR PERSONAL DATA?

There are several legal bases on which we rely to process your personal data:

Legal Basis	Explanation
Consent	Where required by law, we may ask for your consent to use your personal data. If this is the case, we may provide you with more specific information. You can withdraw your consent at any time by contacting us.
Performance of a contract	Your personal data may be required to enter or carry out a contractual agreement that involves you. This could include fulfilling the purchase of a WiZ product or service, managing your account registration and maintenance, resolving delivery-related problems, processing returns, ensuring the secure and reliable functioning of your WiZ product, and addressing your requests.
Compliance with a legal obligation	Your personal data may be used to ensure compliance with applicable laws, such as fulfilling legal requests from law enforcement authorities and adhering to regulatory investigations and compliance requirements.
Legitimate interests	We may use your personal data for our legitimate interests. This includes analyzing and enhancing our WiZ products and services, along with the content of our websites and apps, personalizing our products and services, keeping you informed about software updates or other transactional, legal, or service-related information, using your personal data for administrative purposes and for detecting and preventing fraud. We may also rely on our legitimate interest to send relevant personalized marketing communications, or for our direct

marketing efforts unless it is required by applicable law to obtain your consent.

[Top of page ↑](#)

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your personal data for the period necessary to fulfill the purposes for which it has been collected. Please keep in mind that in certain cases a longer retention period may be required by law. The criteria used to determine our retention periods include:

- How long is the personal data needed to provide you with our products or product functionalities or to operate our business?
- Do you have an account with us? In this case, we may keep your personal data while your account is active or for as long as needed to provide the product functionalities to you.
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for litigation, protection against a possible claim, or tax purposes.

Your personal data processed is retained for as little time as necessary, after which we anonymize or delete it when there is no longer a consumer, legal, or business need for your personal data to be retained.

[Top of page ↑](#)

WHEN DO WE SHARE YOUR PERSONAL DATA?

We never sell your personal data. We also do not share your personal data except in the cases described here. Whenever we share your personal data, we ensure that the appropriate safeguards are in place.

If it is necessary for the fulfillment of the purposes described in this Privacy Notice, we may share your personal data with the following parties:

- Our subsidiaries and affiliates: due to our global nature, your personal data may be shared with our affiliates.
- Service providers and business partners: like many businesses, we may outsource certain activities to trusted third-party service providers to perform functions and provide services to us, such as cloud providers, consulting providers, shipping providers, payment providers, and electronic communication service platforms.
- Public and governmental authorities: We may share your personal data when required by law, or as necessary to protect our rights, we may share your personal data with entities that regulate or have jurisdiction over us or our subsidiaries and affiliates.
- Professional advisors and others: we may share your personal data with other parties including professional advisors, such as banks, insurance companies, auditors, lawyers, accountants, and other professional advisors.
- Other parties in connection with corporate transactions: we may also, from time to time, share your personal data during corporate transactions, such as during a sale of (part of) a business to another company, or any reorganization, merger, joint venture, or other disposition of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).

- To third parties in the WiZ ecosystem: If you choose to connect your WiZ lighting system with products and services of providers complimenting the WiZ ecosystem (e.g., voice assistants, third-party applications, etc.), we may share with them limited information such as light configuration and state. These third-party services are offered by independent third parties. You should carefully review their policies to determine how they will treat your personal data.
- Upon your privacy request in case of a personal data portability request, we will disclose your personal data to the entity you have indicated you want to port your personal data to.
- We may share your personal data with any other party if you have provided your prior consent for this.

[Top of page ↑](#)

HOW DO WE TRANSFER YOUR PERSONAL DATA ABROAD?

As we are a global organization, your personal data may be transferred to or accessed from different countries.

For cross-border transfers within our companies, we rely on our [Binding Corporate Rules \(“Signify Privacy Rules”\)](#). Our Signify Privacy Rules require all Signify affiliates, subsidiaries, and trusted third parties worldwide to use the same or similar standards of protection for personal data regardless of their location.

For cross-border transfers outside our companies, whenever we transfer your personal data outside the European Economic Area (EEA) and/or to a country that does not have an adequacy status, we ensure compliance with applicable data protection laws and implement adequate technical, organizational, and legal mechanisms (for instance, by using the Standard Contractual Clauses as approved by the European Commission) that ensure a level of protection that is essentially equivalent to that in the EEA.

[Top of page ↑](#)

HOW DO WE SECURE YOUR PERSONAL DATA?

We have appropriate security measures in place to prevent personal data from being accidentally lost, used, or accessed in an unauthorized way. We limit access to your personal data to those who have a genuine business need to know it, including requiring our service providers to use appropriate measures to protect the confidentiality and security of your data. Those processing your information may do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a data security breach where we are legally required to do so. More information on our security-by-design approach can be found [here](#). If you have reason to think that your interaction with us or your personal data is no longer processed securely, please contact us.

[Top of page ↑](#)

WHAT ARE YOUR PRIVACY RIGHTS?

You have the following privacy rights:

- **Confirmation:** Obtain confirmation from us as to whether we process your personal data.
- **Access:** Obtain a copy of your personal data being processed by us.
- **Rectification:** Have your personal data rectified.
- **Erasure:** Have your personal data anonymized or deleted.
- **Restriction:** Have your personal data restricted.
- **Object to:**

- **(General)** the use of your personal data on grounds relating to your situation, unless we can demonstrate prevailing compelling legitimate grounds for the processing of your personal data.
- **(Direct marketing)** receiving direct marketing communications. If you object to the processing of your personal data for direct marketing purposes, the relevant personal data shall no longer be processed for such purposes.
- **(Automated decision-making)** the use of your personal data which is based solely on automated personal data (including profiling), and which results in adverse legal or similarly significant effects concerning you.
- **Data Portability:** the right to receive your personal data in a structured, commonly used, and machine-readable format and have the right to transmit that personal data to another company.
- **File a complaint or contact us at any time:** with privacy-related questions and/or complaints regarding the application or violation of our Privacy Rules or Privacy Notice by us.



To exercise your rights, use our [privacy request form](#) or contact us.

You also have the right to obtain a copy of our [Signify Privacy Rules](#) and make use of your third-party beneficiary rights and/or claim damages. Additionally and if applicable to you, the EU General Data Protection Regulation also gives you the right to lodge a complaint with your [local supervisory authority](#).

The above rights are not absolute and can be reasonably limited, for example when the exercise of such rights adversely affects the rights and freedoms of others. For more detailed information on your rights, please see our [Signify Privacy Rules](#).

[Top of page ↑](#)

DO WE COLLECT PERSONAL DATA FROM CHILDREN?

We do not intentionally collect information from children.

- Special note to children under the legal age of majority: if you are under the legal age of majority in your country of residence, you will need your parent or guardian's consent before sharing your personal data with us.
- Special note to parents of children under the legal age of majority: we recommend you check and monitor your children's use of our products, systems, services, and applications (including websites and other digital channels) to make sure that your child does not share personal data with us without asking for your permission.

[Top of page ↑](#)

WHAT ARE YOUR RESPONSIBILITIES?

We would like to remind you that it is your responsibility to ensure that the personal data you provide us with is accurate, complete, and up to date. Furthermore, if you share with us the personal data of other people, it is your responsibility to collect such personal data in compliance with local legal requirements. For instance, you should consider informing other people, whose personal data you provide to us, about the content of this Privacy Notice and obtain their prior consent. It is your responsibility to ensure that the information you share with us does not violate any third party's rights.

If you decide to return, sell, or share a WiZ product with others, or if you are considering using a secondhand WiZ product, please note that certain WiZ products may internally store personal data relating to you or your use of the product. In such cases, please make sure:

- In case you give access to third parties to your WiZ products or services, you are comfortable with these third parties being able to access the personal data contained within them.
- You consider performing a factory reset of the product.

We strongly encourage you to periodically check which home members have access to your WiZ ecosystem. This can be done through the settings tab in your WiZ mobile application.

[Top of page ↑](#)

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice may change from time to time. We encourage users to periodically review this Privacy Notice for the latest information on our privacy practices. The most recent version of this Privacy Notice will govern our processing of your personal data and can be found on the WiZ website.

[Top of page ↑](#)

COOKIES AND SIMILAR TRACKING TECHNOLOGIES

We make use of functional cookies, analytic cookies, and advertising cookies in our websites and mobile applications. Where required, we will ask for your prior consent.

To learn more please read our [Cookie Notice](#).

[Top of page ↑](#)

HOW TO CONTACT US

For any questions related to the protection of your personal data by us or regarding this Privacy Notice, you can contact the Signify Privacy Office:

- Mail: Signify - Attn: Privacy Office – Basisweg 10, 1043 AP Amsterdam, the Netherlands; or
- Online: [Signify Privacy Center](#), “Privacy request” section.

Please keep in mind that certain communication channels are not always secure. Therefore, please do not include sensitive information in your communications to us.

[Top of page ↑](#)

COUNTRY-SPECIFIC PRIVACY NOTICES

In case of conflict between any provisions below that are applicable to you and the overall Privacy Notice, the provisions of the Country Specific Privacy Notice will prevail.

[Top of page ↑](#)

USA-SPECIFIC PRIVACY DISCLOSURES

If you are a resident of [California](#) or [Virginia](#), this Privacy Notice is supplemented by a US State Specific Privacy Notice, which also applies to you.

[Top of page ↑](#)

CALIFORNIA PRIVACY DISCLOSURES

The California Consumer Privacy Act (hereafter: 'CCPA') and the California Privacy Rights Act (hereafter: 'CPRA') provide California consumer residents who reside in California with specific rights regarding their Personal Information (personal data). In addition to the above this section describes your CCPA/CPRA rights and explains how to exercise those rights.

The following does not apply to de-identified or aggregated Personal Data or data publicly available.

Information we collect:

In the execution of our services and/or when visiting our websites, we collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (defined as "Personal Data"). The purposes for which we process your Personal Data can be found above under the section "[HOW DO WE USE YOUR PERSONAL DATA?](#)". Information about retention periods can be found under the section "[HOW LONG DO WE KEEP YOUR PERSONAL DATA?](#)".

We may have collected and/or disclosed for an aforementioned purpose the following categories of data of our consumers in the last twelve (12) months before the effective date of this Notice the following categories of Personal Data from you:

Category	Examples	We Collected	We Disclosed
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Data included in this category may overlap with other categories.	NO	NO
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth, and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO	NO
D. Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics or activity patterns used to extract a template or other identifier or identifying information,	NO	NO

	such as fingerprints, faceprints, voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.		
F. Internet or other similar network activity	Browsing history, search history, and information on a consumer's interaction with a website, application, advertisement, or other content.	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice
G. Geolocation data	Physical location or movements, or the location of your device or computer.	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice
H. Sensory data	Audio, electronic, visual, or similar information.	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice
I. Professional or employment-related information	Current or past job history or performance evaluations.	NO	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	NO
K. Inferences drawn from other Personal Data	Profile reflecting a person's preferences, characteristics, or behavior,	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice
L. Sensitive Personal Information	Personal information that reveals account log-in, password, or credentials allowing access to an account, the contents of a mail, email, and text messages.	YES	YES, to affiliates, service providers, and other vendors mentioned in this Notice

We disclose your data for a business purpose to the following categories of third parties:

- Signify group companies.
- Service providers.
- Third parties to whom we disclose your personal data in connection with products or services we provide to you, and to accomplish our business purposes and objectives as outlined in the notice.

[Top of page ↑](#)

Data from children?

We do not intentionally collect information from children under the age of sixteen (16) years as we do not offer services to them. Parents who set up a profile holding information about children under the age of sixteen (16) years can only do so by granting parental consent which consent choices can be changed by the adults in the family. We do not direct services to children under the age of thirteen (13) years old. As a result, we do not knowingly process data or information from children under thirteen 13 years old.

[Top of page ↑](#)

Do not sell or share Personal Data?

We do not respond to “Do Not Sell” requests as we do not sell your personal data to third parties. In the twelve months before the effective date of this Privacy Notice, we have not sold any Personal Data of Customers, as per the definition of the CCPA/CPRA.

After receiving your opt-in consent, we sometimes disclose personal data collected via cookies for cross-contextual behavioral advertising purposes, which may qualify as sharing your Personal Data under the CCPA/CPRA. To opt out, you can adjust your cookie preferences on our website to block our advertising cookies, or you can change your device settings to block cookies or install a third-party plugin to control how cookies interact with your device. For more information on how we use cookies and other tracking technologies, read our [Cookie Notice](#).

[Top of page ↑](#)

Your rights?

- **"Right to Know"**: You may have the right to request that we disclose to you what Personal Data of yours we collect, use, and/or disclose.
- **"Right to Delete"**: You may have the right to request the deletion of your Personal Data collected or maintained by us. Depending on your Choices, certain offerings may be limited or unavailable. Upon verifying the validity of a deletion request, we will delete your Personal Data from our records, and instruct any service providers or third parties to delete your information, when applicable.
- **"Right to Control Use"**: You may have the right to control or limit the use of your Personal Data, including:
 - Right to Opt-Out of Sales/Sharing/cross-context behavioral advertising
 - Right to Object to or Opt Out of automated decision-making/profiling
 - Right to Opt-Out of processing/Limit Use of Sensitive Personal Data
- **"Right of Access"**: You may have the right to access your Personal Data, and to transmit it to another entity.
- **"Right of Correction"**: You may have the right to request amendments to your Personal Data if it is inaccurate or outdated in any way. Upon verifying the validity of a verifiable correction request, we will use commercially reasonable efforts to correct your Personal Data as directed, considering the nature of the Personal Data and the purposes of maintaining your Personal Data.

You may also make a verifiable request to exercise your rights by [contacting us via this link](#) or the toll-free telephone 1-800-555-0050.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. If you have questions about the foregoing or how to execute your rights in our Notice or specifically with regard to categories and specific data processed, categories of sources from which your data is collected by us, categories of Third Parties with whom we share your data, and/or the business or commercial purpose for collecting please contact our Privacy Office (see section "[What are your Privacy Rights?](#)").

If we cannot verify you (or your authority to act on behalf of another person) we have the right to deny the requests. While verifying your identity we shall generally avoid requesting additional information from you for verification purposes. If, however, we cannot verify your identity from the information already maintained by us, we may request additional information from you, which shall only be used to verify your identity while you are seeking to exercise your rights under the CCPA/CPRA, and for security or fraud-prevention purposes. We shall delete any new Personal Data collected for verification as soon as practical after processing your request, except as required to comply with applicable legislation.

An "authorized agent" means a natural person, or a business entity registered with the Secretary of State that you have authorized to act on your behalf, conditioned you have:

1. Provided the authorized agent written permission to do so, and we could verify this; and
2. Verified your own identity directly with the business.

Subsection 1 does not apply when you have provided the authorized agent with a valid power of attorney.

We do our utmost to timely respond to a verifiable Individual, and in a portable format unless it is excessive, repetitive, or materially unfounded. If we require more time, we will inform you of the reason thereof and the extension period in writing.

[Top of page ↑](#)

Non-Discrimination

We will not discriminate against you for exercising your rights under the CCPA/CPRA.

Based on the complexity of the request and the applicable regulations, we may charge a fee for your request. We may offer a CCPA/CPRA-permitted financial incentive, participation in a financial incentive program requires your prior opt-in Consent, which you may revoke at any time.

[Top of page ↑](#)

VIRGINIA PRIVACY DISCLOSURES

The Virginia Consumer Data Protection Act (hereafter “VCDPA”) provides Virginian consumer residents who reside in Virginia with specific rights regarding their personal data. In addition to the general Privacy Notice, this section supplements it, describes your VCDPA rights and explains how to exercise those rights.

The following does not apply to de-identified or aggregated personal information or data publicly available.

As a Virginia resident, you have the following rights, subject to some exceptions, regarding your personal data effective as of January 1st, 2023:

1. Right to Confirm if a Controller is processing your personal data and to access personal data.
2. Right to Correct inaccurate personal data.
3. Right to Delete.
4. Right to Obtain a copy of personal data in a portable format.
5. Right to Opt-Out of the processing of personal data for purposes of targeted advertising, sale, or profiling with legal or other significant effects.
6. Right to Appeal – Consumers have the right to appeal a controller's (i.e., business) denial to act within the time outlined in the VCDPA.

You may also make a verifiable request to exercise your rights by [contacting us via this link](#) or the toll-free telephone 1-800-555-0050.

Please note that the above rights are not absolute, and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. If you have questions about the foregoing or how to execute your rights in our notice or specifically concerning categories and specific data processed, categories of sources from which your data is collected by us, categories of third parties with whom we share your data, and/or the business or commercial purpose for collecting please contact our privacy office (see section "[What are your Privacy Rights?](#)").

We do not respond to “Do Not Sell” requests as we do not sell your personal data to third parties. In the twelve months before the effective date of this notice, we have not sold any personal data of customers, as per the definition of the VCDPA.

After receiving your prior consent, we sometimes disclose personal data collected via cookies for cross-contextual behavioral advertising purposes, which may qualify as sharing your personal data under the VCDPA. To opt out, you can adjust your cookie preferences on our website to block our advertising cookies, or you can change your device settings to block cookies or install a third-party plugin to control how cookies interact with your device. For more information on how we use cookies and other tracking technologies, read our [Cookie Notice](#).

[Top of page ↑](#)