

## Sonos, Inc. Privacy Statement

*Last update: February 2020*

We deeply respect your privacy and right to control your personal data. Our guiding principles are simple:

- We use data to serve our listeners.
- We provide meaningful choices that are easy to understand.
- We collect only what we need.
- We protect the data of our listeners as if they were our own.

The primary purpose of collecting your data is to improve your listening experience. Whether we're collaborating with music services to make sure you have access to your favourite playlists and can discover new artists, or giving you the ability to start off the music with your voice or the touch of your smart home system, or offering highly responsive customer support when something goes wrong, our aim is for you to listen as effortlessly as possible. To that end, we only collect your data for clearly defined purposes. **We do not and will not sell your personal data to third parties.**

This Privacy Statement (the 'Statement') explains the personal information we collect from you, either directly or indirectly, and how we will use it. Personal information is any information that can be used to identify you or that we can link to you. The Statement also elaborates on the choices you can make about the data we collect, and how you can control these decisions. It applies to all products offered by Sonos ('Sonos Product(s)'), including our Sonos control app ('Sonos app' or 'app') or services, for example the Sonos website, Sonos Radio, as well as other offline interactions, such as visiting a Sonos store or attending a Sonos event (collectively referred to as 'Services'). Please read this Statement carefully to understand how Sonos may collect, use, and share your personal information. The terms 'we', 'us', or 'Sonos' are each intended as reference to Sonos, Inc.

This Statement describes:

- The Types of Personal Information We Collect
- Customer Interactions with Sonos
- How We Use Personal Information
- How We May Share Personal Information
- The Legal Bases for Using Personal Information
- Security, Storage, and Retention of Personal Information We Collect
- Your Rights and Choices
- Our Use of Cookies and Other Similar Technologies
- How to Contact us
- Changes to Our Privacy Statement

### THE TYPES OF PERSONAL INFORMATION WE COLLECT

#### Information you provide to us

We collect information you voluntarily provide to us, such as your name, phone number and email address; for instance, when you want to learn more about Sonos Products and Services or when you contact our Customer Care group for assistance with your Sonos Products.

## Information we collect automatically

We automatically collect information about you, such as [Functional Data](#) (as defined below) and [Additional Usage Data](#) (as defined below) about your use of Sonos Products and Services or information collected by using cookies and similar technologies when you use, access, or interact with us via our websites or app. We may, for example, collect information about the type of device you use to access our websites, the operating system and version, your IP address, your general geographic location as indicated by your IP address, your browser type, the webpages you view on our websites, and whether and how you interact with content available on our websites.

## Information obtained from other sources

We may receive information about you from other sources, including third parties, such as music service partners and partners with whom we offer co-branded services or engage in joint-marketing activities. We may also receive information about you from social media platforms, for instance, when you interact with us on social media. We protect data obtained from third parties according to the practices described in this Statement and we also apply any additional restrictions imposed by the source of data.

## Information of children

Sonos does not target and is not intended to attract children under the age of sixteen. Although visitors of all ages may navigate through our website or use our app, we do not knowingly collect or request personal information from those under the age of sixteen without parental consent. If, following a notification from a parent or guardian or discovery by other means, a child under sixteen has been improperly registered on our site by using false information, we will cancel the child's account and delete the child's personal information from our records.

## CUSTOMER INTERACTIONS WITH SONOS

To make the information in this Statement easy to understand, we have highlighted different occasions when Sonos could potentially collect personal information from customers. The customer interactions with Sonos are broken down into the following segments:

### Learning about Sonos

As you gather more information about Sonos, you may virtually or physically visit a site that we own. Examples include browsing our website, calling our in-house sales representatives, physically visiting a Sonos-owned store or attending Sonos-sponsored events. To learn more about Sonos Products, you may voluntarily provide personal information, such as your name and email address, during these interactions. We may also collect information about you online via [cookies or similar technologies](#) when you visit our websites.

**We collect:** name, email address, IP address, and information provided by cookies or similar technology.

**Why:** We use this information to share news about events and products offered by Sonos. Additionally, the IP address helps us to understand geographic information about our website's visitors better, so that we can improve our website for everyone. It is our legitimate interest to process your personal data for these purposes.

## Buying Sonos Products

Once you have decided to buy a Sonos Product, we offer a way for customers to buy directly from us at [www.sonos.com](http://www.sonos.com) or at a Sonos retail store. When you buy from us, you may be asked to provide information so that we can complete your purchase.

**We collect:** your name, phone number (optional), email address, delivery/shipping address, and payment information.

**Why:** We use this information to complete your transaction, carry out any follow up with you about your purchase, help with any delivery issues, handle returns, and other issues related to the purchase of Sonos Products. Processing your personal data for this purpose is necessary for the performance of the agreement we have with you. **Please note, we do not store any payment or credit card information. We only use payment information in connection with the purchase of Sonos Products.**

## Registering your Sonos System

Once you receive your Sonos Products, you will be required to connect your Product to a network at home. Each Sonos Product needs to be connected to the internet for set-up. As part of the initial set-up, you will be asked to download the Sonos control app either from our website or a third-party website, such as the Chrome Web Store. The Sonos app allows you to control your Sonos system from the device of your choice (for example your phone or tablet). During the set-up process, the Sonos app will ask you to set up an account and register your system with Sonos. **You must register your Sonos Products, in order for them to work.**

As part of registering your Sonos Product, the app will prompt you to enter information such as an email address and location data (country, postcode) which is required to provide this information to register your Sonos system. Your Sonos system will then establish a unique alpha-numeric identification number which we use to help identify your specific Sonos system in a less personal manner. This identification number will be associated with the email address that you provide along with the Product serial number and the IP address from where the Product connected. As part of registration, you will need to set up a Sonos account. We collect your password to your Sonos account which is only used for authentication and Sonos account access.

**We collect:** your name, phone number, email address, location data, your password, and IP address. Please note, your password is stored using one-way hash, which means that it cannot be recovered (or disclosed) by anyone, including Sonos.

**Why:** We collect this information to help get your Sonos Product working securely (which helps prevent unauthorised access to your Sonos Products or home network) and to make sure that we enable you to select the right music service options based on your geographic location (e.g. radio stations available in your country). This processing is necessary for the performance of the contract we have with you. We also use your email to send you Sonos-related notifications, such as promotional messages, software updates, information about Sonos Products and/or Services, and to share exciting Sonos news and Product offerings. It is our legitimate interest to process your personal data for these purposes.

## Using Sonos Products

There are three main reasons we collect information from your Sonos Products: (1) to offer you music services or other audio content choices (e.g. radio, tv or games) which is necessary for the

performance of the agreement we have with you, (2) to offer you control over your Sonos system which is necessary for the performance of the agreement we have with you, and (3) to make your Sonos Products better over time which is our legitimate interest.

Using Sonos Products involves selecting audio content to play in the rooms of your choice. Although you can play free internet radio or music files stored locally on your home network (for example on your computer's hard drive), most Sonos owners prefer to add a streaming music service for playback via their Sonos Products. Examples include Spotify, Apple Music, and other audio content services. The addition of any of these music services requires you to link your individual music service to your Sonos system. Once you have started playing music or other audio content on your Sonos Products, the data we receive is dependent on your preferences.

### Functional Data

This data is absolutely necessary for your Sonos Product or Service, including Sonos Radio, to perform its basic functions in a secure way and **you will not be able to opt out from this data collection, sharing, and/or processing** if you want to continue to use your Sonos Products.

#### We collect:

- **Registration data.** This data includes your email address, location, language preference, Product serial number, IP address, and Sonos account login information (as described above).
- **System data.** This data includes things like Product type, controller device type, controller operating system, software version, content source (audio line in), signal input (e.g. whether your TV outputs a specific audio signal such as Dolby to your Sonos system), information about WiFi antennas, system settings (such as equalisation or stereo pair), Product orientation, names of the music service(s) you added/enabled on your Sonos product, the names you have given your Sonos Product in different rooms, whether your Product has been tuned using Sonos Trueplay technology, system performance metrics (e.g. the temperature of your Product or WiFi signal strength) and error information.

**Why we collect Functional Data:** We collect this information to help ensure that your Products are working properly, to provide you with customer support, to honour your audio preferences, and to guide product improvement and customer support decisions. We also collect this information to guide product improvement and customer support decisions which is our legitimate interest.

### Additional Usage Data

In order to improve your experience with Sonos Products and to offer better, personalised Sonos Products and Services, including Sonos Radio, that meet the needs and expectations of our customers, we collect the following Additional Usage Data. The processing of this information is in our legitimate interest as further set out below (under Why). You can opt out of sharing this data by following the steps listed [here](#).

#### We collect:

- **Performance Information.** This includes things like the temperature of your Product, WiFi information like signal strength, how often you use music services you have connected to your Sonos system (including, for some services, your login username, but not password), information about how often you use the Sonos app versus other control mechanisms, flow of interactions within the Sonos app, how often you use the physical controls on the unit,

the flow of interactions within the Sonos app, duration of Sonos Product use, and, as required for certain Services, location-based data using GPS (or similar technology, where available) and crowdsourced WiFi access points and cell tower locations collected from your third party device when the Sonos app is in use.

- **Activity Information.** This includes duration of music service use, Product or room grouping information, command information (such as play, pause, change volume, or skip tracks), information about playlist or station container data including listening history ('Recently Played'), and Sonos playlist or Sonos favourites information; each correlated to individual Sonos Products and your interactions with them. If you enable voice control or use Sonos Radio, we will additionally collect information about track data when using those features.

**Why:** We collect this information so that we can help ensure Sonos Products are functioning properly, provide a personalised experience for our customers, determine what types of Product or feature improvements would please our customers most, and to help predict potential problems with Sonos Products. Additionally, to provide Sonos Radio, we collect location-based information for licensing and reporting purposes. Collecting this data is our legitimate interest to support a user-friendly experience that meets your needs and help you with issues you may experience. It is your choice if you want us to collect this information, and therefore you can opt out of sharing this data by following the steps listed [here](#).

**Note:** personalisation services (e.g. Recently Played), Sonos Radio, Voice Control, and Direct Control functionality require Additional Usage Data to function. If you decide to use any of these features and/or Services, the Additional Usage Data becomes functional. You can always clear all Recently Played by following the instructions in the Sonos app.

### **Direct Control or Voice Control Functionality**

As the world and our homes become more connected, we realise that our customers may prefer to control their Sonos Products by means other than their Sonos app, for example, by using a voice enabled product (like Amazon Alexa), through a home control mechanism (e.g. a Lutron Pico remote), or through the app offered by their favourite music service.

To enable this function, you will be prompted to allow such devices to connect with your Sonos system (similar to the process you go through to connect a music service). Once this function is enabled, we collect and process the Functional Data, the Additional Usage Data, and Audio Data.

Sonos will share a subset of this data with partners that provide the services you have requested. Sharing your relevant data with these partners and further processing of such data is necessary for the performance of the contracts with these partners for your benefit, in order to ensure that the voice or direct control function is working properly. If you wish to object to any such processing, simply disable the feature (for example, disable voice control) or unlink the feature (for example, unlink your home automation remote) from your Sonos Products. However, the voice control function or other direct control functionality will not work unless you authorise us to collect and process the data as outlined in this section.

**We collect:** [Functional Data](#), [Additional Usage Data](#), and certain [Audio Data](#)

**Why:** This information is needed to fulfil the agreement we have with you, to ensure proper functionality and to help improve these features, which is also our legitimate interest.

## Audio Data

Sonos is not continuously capturing sound in your home. There are two occasions when we will capture sound from within your home: (1) when you enable voice control technology on the voice-enabled Sonos Product (such as Sonos One or Beam); and (2) when you utilise our innovative Trueplay room-tuning technology.

## Voice Control

Voice control works by your voice-enabled Sonos Product 'listening' for a key wake-up word. Please note, not all Sonos Products are voice-enabled, and if your Sonos Product is voice-enabled, you will have to actively enable your Sonos Product to start 'listening.' In further detail, this 'listening' means that voice-enabled Sonos Products buffer and re-record locally, without transmitting or storing any information, until they detect the word or phrase (such as "Alexa") that triggers the device to begin actively recording. If the Product does not detect the wake-up word, it continues to record over itself in a never ending loop lasting a few seconds. This is all done locally on your Product and is not sent to Sonos or any third party. If a wake-up word is detected, the Sonos Product begins recording. In other words, it does not record or retain any audio data, or begin to transmit any data until it is 'woken up.' You are notified that it is recording by a visual element, such as a light on the Sonos Product, and a specific sound. The Product will record until your voice command is finished. The actual recording of your voice command is then sent to the voice partner you have authorised to receive such recording (for example, Amazon). **Sonos does not retain a copy of your voice recording.** Concurrent with the voice recording, your Product will collect data (for example, decibel level at each frequency) about the ambient noise in the room. It is not possible to extract any speech from this type of data. We collect this data to help us improve our speech recognition technology which is our legitimate interest. If you are trying to state a voice command whilst music is playing for example, Sonos may improve the technology by lowering the music so that your voice command can be understood properly.

## Trueplay room tuning

Innovative Trueplay analyses acoustic factors that can impact sound quality in the room where your Sonos Product is placed. You will have to actively enable Trueplay. The purpose of the Trueplay analysis is to alter your Sonos Products in a manner that enhances the sound. To do this, a user goes through an interactive process ([watch the video here](#)) that gathers certain data about your room (for example, the number of speakers and speaker placement), including information about background noise levels (for example decibel level at each frequency). This information is used to help make sure that the tuning gives you the best outcome possible. For example, if your dog barks during the Trueplay testing, the Product knows to ignore the background noise of a barking dog during the testing. The collection of this data is necessary for the fulfilment of the agreement we have with you if you activate Trueplay.

## Getting Help from Sonos

From time to time, you may decide to contact our Customer Care group for assistance with your Sonos Products. To be able to offer you the best service possible, we may collect certain data from you or your Sonos Products.

**We collect:** This may include contact information, such as your name, email address, phone number, social media identifiers (if you contact us using a social media channel), and the content of your chats and other communications with Sonos Customer Care (including, in some cases, voice recording if you call Customer Care). In certain situations, it is useful for the Customer Care team to

have a 'Diagnostic' of your Sonos system. This is essentially a technical system snapshot of all relevant information leading up to the incident and includes information such as the music service being used, volume level, Product configuration, WiFi signal and router information, error codes, device information (e.g. the operating system, and version of the Sonos app being used). Collecting the above described information is necessary to provide customer support. You will be informed in advance before we make a snapshot. We do not capture snapshots without telling you first. If you are a Beta tester, we take a daily diagnostic of your Sonos system automatically (per the terms of the Beta tester agreement).

**Why:** We collect this information to give you the best and most efficient customer support possible. For instance, for customer enquiries and technical questions, we use the contact information to respond to the customer in their preferred channel (phone, email, social). For technical problems, we use system diagnostic data to effectively troubleshoot the issue. For product returns and/or exchanges, we use the contact information to ensure successful product receipt and/or delivery. Using these types of data is necessary to fulfil the agreement we have with you.

## **HOW WE USE PERSONAL INFORMATION**

Sonos uses your personal information we collect to provide you with the Sonos Products and Services we offer, which includes using data to improve and personalise your experiences. We also use your personal information to communicate with you, for example, informing you about your account, new Sonos Products or Services available, security, and other types of updates. Additionally, as described below, we may use other data related to your interactions with Sonos Products and Services in order to provide certain Sonos Services and for advertising purposes.

Sonos uses the data for the following purposes:

### **Purchase and Delivery of Sonos Products and Services**

We use your personal information to take and handle orders, deliver Products and Services, process payments, and communicate with you about orders, Products and Services, and promotional offers. This processing is necessary for the performance of the agreement we have with you.

### **Product Experience, Recommendations, and Personalisation**

We use data to provide, operate, support, and improve the Sonos Products and Services we offer to ensure our customers can listen as effortlessly as possible. We use your personal information to recommend features, Products, and Services that might be of interest to you, identify your preferences, and personalise your experience with Sonos Products and Services. This processing is necessary for the performance of the agreement we have with you, as well as to serve our legitimate interest.

### **Customer Support**

We use data to respond to customer enquiries, diagnose Product problems, repair customers' Sonos Products and provide other customer care and support services. This processing is necessary for the performance of the agreement we have with you, as well as to serve our legitimate interest.

### **Product Improvement**

We continually use data for research purposes and to develop and improve our Sonos Products and Services, including maintaining and improving the performance of our Sonos Products and Services,

developing and adding new features or capabilities, such as using error reports to improve security features, using search queries and clicks to improve the relevance of search results, and using usage data to determine what new features to prioritise. We use your personal information to provide functionality, analyse performance, fix errors, and improve usability and effectiveness of Sonos Products and Services. This processing is necessary to serve our legitimate interest.

### **Provide Voice Services**

When you use a third-party voice service via our Products, we process your voice input and other personal information to respond to your requests, provide the requested service to you, and improve Sonos Products and Services. As part of the provision of the Sonos Radio service and to provide you with tailored content, we will, through our agreements with these third-party voice services, receive voice control information related to your listening preferences, such as stations you request and tracks that you played and/or skip. Please note that your use of third-party voice services is subject to these third-party terms of use or service and their respective privacy notices. We encourage you to read these third-party terms carefully before you enable them on your Sonos Products. Our processing of your personal information is necessary for the performance of our agreement with you, as well as to serve our legitimate interest.

### **Provide Sonos Radio Service**

When you use Sonos Radio service, we collect and process certain Functional and Additional Usage Data (e.g. your IP address, language selection, your Sonos ID, radio stations browsing history, your search terms for stations, playback actions, system, third party device ID and type, and content events such as individual radio stations and/or tracks) and other listening activity (e.g. listening session length, stations listened to, and tracks listened to and skipped) within the Sonos Radio. We collect and process this information in order to provide you with a customised experience, respond to your requests, provide the requested service to you, to determine relevant licensing, to serve marketing communications and to improve Sonos Products and Services. Additionally, your IP address and any anonymised ID will be provided to third-party radio content providers to provide you with access to radio stations. This processing is necessary for the performance of our agreement with you, as well as to serve our legitimate interest. For more information on this, please visit [The Legal Bases for Using Personal Information](#).

Some features or services of Sonos Radio may rely on third-party based location information using GPS (or similar technology, where available) and crowdsourced WiFi access points and cell tower locations. To provide such features or services, where available, Sonos and its partners must collect, use, transmit, process, and maintain your location data, including but not limited to the geographic location of your third-party device and information related to your Sonos app, your Sonos account, and any Sonos Product(s) registered thereunder, including but not limited to your Sonos ID, third-party device ID and device name, and third-party device type. You may withdraw consent to Sonos's and its partners' collection, use, transmission, processing, and maintenance of location and account data at any time by not using the location-based features and turning off your location services in settings (as applicable) on your third-party device.

### **Security, Safety, and Dispute Resolution**

We use data to protect the security and safety of our customers, Sonos Products and Services, to detect and prevent fraud, to resolve disputes, and enforce our agreements. We may use third parties to assess and manage credit risks. This processing is necessary to serve our legitimate interest.



## Business Operations

We use data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business. This processing is necessary to serve our legitimate interest.

## Communication, Marketing, and Advertising

We use the data we collect to deliver and personalise our communications with you. For example, we may contact you by email or other means of electronic communication (including through the Sonos app and Sonos Products via voice-enabled technologies) to inform you about new Sonos Products or Services, new music services available in your area, and security or software updates, to update you on a support issue, or to invite you to take part in a survey. If you choose to use Sonos Radio, we may use information such as your interactions with Sonos site, Sonos Radio content, Sonos Products, Sonos app, and other Services to display interest-based ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads. This processing is necessary to serve our legitimate interest. For more information on this, please visit [The Legal Bases for Using Personal Information](#).

We also use [cookies and similar technologies](#) to provide the most relevant Sonos advertising to you. For information about managing email subscriptions and promotional communications, please visit [Your Rights and Choices](#).

## Purposes for which we seek your consent

We may also ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time, and we will stop processing your personal information for that purpose.

## HOW WE MAY SHARE PERSONAL INFORMATION

**Sonos does not and will not sell personal information about our customers.** We want you to understand that information about our customers is an important part of our business. We only disclose your data as described in this Statement. We may share information with the following types of third parties.

### Third-Party Vendors

Sonos uses a variety of third-party vendors to carry out services like website management and hosting, cloud-related services, online Product purchases and shipping (including fulfilling orders for Products or Services, delivering packages, sending postal mail and email), credit cards and other alternative payment processing, email communications, analysing data, providing marketing assistance, transmitting content, if applicable scoring credit risk, and providing customer service. We only share your personal information as necessary, such as to complete a transaction or to provide a Product or Service you have requested or authorised and only with vendors or agents working on our behalf for the purposes described in this Statement. In this case, your personal information will be shared with these agents or contractors but only for the purpose of performing services on behalf and under the instructions of Sonos and in accordance with this Statement. It is our legitimate interest to share information with these parties for these purposes. For questions about third-party vendors, please send an email to [privacy@sonos.com](mailto:privacy@sonos.com).

## Transactions involving Third Parties

Sonos makes available to you services, features, and/or skills provided by third parties for use on or through Sonos Products. We also offer services and/or sell product lines jointly with third-party business, such as co-branded IKEA products. Depending on your use of the third-party products, features, skills, and/or services, we may share certain personal information we have about you with these third parties to enable functionality and/or provide customer support. Please note that functionality of these third-party products, features, skills, and/or services is subject to these third-party terms of use or service and their respective privacy notices. We encourage you to read these third-party terms carefully before you enable them on your Sonos Products.

### A. Music Services and Other Audio Content Partners

To ensure the best customer experience and that music and/or other audio content services (e.g. radio and audio books) function properly, Sonos may share relevant Product [Activity Information](#) and your instructions with music and/or other audio content services that you have authorised to interact with your Sonos Products. For instance, if you use a music service and/or other audio content service on your Sonos Products or to control your Sonos Products, we will have to share certain information with that music service and/or other audio content service to enable you to do this. Sharing data with music service and/or other audio content services, as instructed by you, is necessary to fulfil the agreement we have with you.

### B. Control Partners

Once you have enabled direct control of your Sonos system, we may share relevant Product [Activity Information](#) with control partners that you have authorised to interact with your Sonos Products. Sharing data with control partners, as instructed by you, is necessary to fulfil the agreement we have with you.

### C. Voice Partners

Once you have activated speech recognition, we may share relevant Product [Activity Information](#) and [Audio Data](#) with voice control partners that you have authorised to receive such data, in order to control your Sonos system. Sharing data with control partners, as instructed by you, is necessary to fulfil the agreement we have with you.

## Advertising Partners

If you decide to use Sonos Radio, we will share a subset of your pseudonymised and anonymised data with third party advertising companies to present, via Sonos Products, interest-based ads for features, products, and services that might be of interest to you. Specifically, we share the following information with our advertising partners: location, language, and genre of the station you are currently listening to (which is not based on your overall listening history). We will share anonymous information with advertisers, which describes the overall listening audience in general. We may also share limited location information (i.e. an IP address and anonymised ID) with some of our third-party radio content partners who may run ads on their stations. We do not use information that personally identifies you to present interest-based ads.

## Sonos-controlled Affiliates and Subsidiaries

We share information with Sonos-controlled affiliates and subsidiaries for business purposes, such as internal administration, promoting Sonos Products, and providing customers with our Sonos

Products and Services. It is our legitimate interest to share information with these parties for these purposes.

### **Compelled Disclosure and Law Enforcement**

When legally required, strictly necessary for the performance of the services or to protect our rights, or the rights of our affiliates or users, we disclose your personal information to law enforcement authorities, investigative organisations, our affiliates, or in legal proceedings. We will share your personal information when we believe in good faith that it is necessary for us to do so in order to comply with a legal obligation under applicable law or to respond to a valid legal process (e.g. a search warrant, a court order, or a subpoena).

### **Sale or Merger**

We may share your personal information in the event of a merger, acquisition, or sale of all or a portion of our assets. Of course, we shall notify you via email and/or a prominent notice on our website and inform you of your rights

### **Sharing and Disclosure of Aggregate Data**

We share data in aggregate form and/or in a form which does not enable the recipient of such data to identify you, with third parties, for example, for industry analysis.

Please note, our Products include links to Products or applications of third parties whose privacy practices may differ from Sonos. If you provide personal data to any of those third parties or their products, your data is governed by their privacy statements, and we encourage you to read these privacy statements carefully.

When sharing data with third parties, your personal information may be transferred to countries where data protection laws may provide a lower standard of protection for your personal information than your country. We take great care in protecting your personal information and have put in place adequate mechanisms to protect it when it is transferred internationally. We will transfer your personal information in compliance with applicable data protection laws and will implement suitable safeguards to ensure that your personal information is adequately secured by any third party that will access your information (for instance, by using the Standard Contractual Clauses as approved by the European Commission). If you have questions or wish to obtain more information about the international transfer of your personal information or the implemented safeguards, please send us an email to [privacy@sonos.com](mailto:privacy@sonos.com).

## THE LEGAL BASES FOR USING PERSONAL INFORMATION

There are different legal bases that we rely on to use your personal information, namely:

### Performance of a Contract

The use of your personal information may be necessary to perform an agreement you have with us. For example, to complete your purchase of your Sonos Product, to register and maintain your account, to help with delivery issues, to handle returns, to register your Sonos system, to provide you with Sonos Radio, and to make sure that your Sonos Product performs its basic functions in a secure way or to respond to your requests.

### Consent

Where legally required, we may rely on your consent to use your personal information. When this is the case, we will provide you with more specific information when we actually request your consent. You may withdraw your consent at any time by sending us an email to [privacy@sonos.com](mailto:privacy@sonos.com). Your withdrawal will not affect the lawfulness of processing based on your consent before your withdrawal.

### Compliance with Legal Obligation

We may use your relevant personal information to ensure compliance with applicable laws; for example, to comply with lawful requests from law enforcement, and for regulatory investigations and compliance.

### Legitimate Interests

We may use your personal information for our legitimate interests. For example, we rely on our legitimate interest to analyse and improve our Sonos Products and Services, including Sonos Radio, and the content on our websites and app, to send you notifications about software updates or information about Sonos Products and Services, and to use your relevant personal data for administrative purposes and for fraud detection and prevention. Furthermore, except where consent is required under applicable local law, we rely on our legitimate interest to send you relevant marketing communications.

When using personal data to serve our legitimate interests, we will always balance your rights and interests in the protection of your personal data against our rights and interests.

Where we process your personal information based on our legitimate interest and no opt-out mechanism is available to you (e.g. in your Sonos Product settings), you may exercise your right to object by sending an email to [privacy@sonos.com](mailto:privacy@sonos.com)

## SECURITY, STORAGE, AND RETENTION OF PERSONAL INFORMATION WE COLLECT

### Security

Sonos is committed to protecting the security of your personal information. However, whilst we take reasonable precautions to guard the personal information we collect, no security system is impenetrable.

We use a variety of appropriate technical and organisational measures and industry standards to protect your personal information and help prevent information about you from loss, theft, misuse, and unauthorised access, disclosure, alteration, and destruction. For example, we store the personal data you provide on computer systems that have limited access and that are in controlled facilities. We also ensure that our third-party data centre vendors provide adequate security measures. Additionally, your data is protected with encryption, such as Transport Layer Security (TLS), during transition over the Internet. Please note, your password is stored using one-way hash, which means that it cannot be recovered (or disclosed) by anyone, including Sonos, it can only be reset.

You can only access your Sonos account information and our service through the use of an individual user login and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please notify us immediately if you believe your password has been misused. You should always log out and close your browser when you finish your session. **Please note, we will never ask you to disclose your password.**

If you have any questions about the security of your personal information, you can contact us at [privacy@sonos.com](mailto:privacy@sonos.com).

## Storage

Personal data collected by Sonos may be stored and processed in your region, in the United States (for example, in our major data centres), or in any other country where Sonos or its affiliates, subsidiaries, or service providers are located or maintain facilities. Sonos has put in place adequate mechanisms to protect personal information when it is transferred internationally, for example by using the Standard Contractual Clauses as approved by the European Commission.

## Retention

Sonos will retain your personal information:

- for as long as we have a customer relationship with you and/or as necessary to enable you to use the website, your Sonos account, and/or your Sonos Product(s);
- for the period required to provide services that you request from us;
- for the period required to provide marketing or other promotional materials that you request from us;
- to comply with our legal obligations, including requirements of regulators and governmental agencies that have authority over us, such as tax and/or accounting obligations, which usually require retaining certain transaction data for periods between seven and 10 years after a transaction has occurred;
- for the period required to resolve disputes with any parties and/or to investigate or defend against potential legal claims; and
- otherwise as necessary to allow us to conduct our business in compliance with applicable laws and regulations.

All personal information we retain will be subject to this Privacy Statement and our internal retention guidelines. Sonos will delete your personal data when it is no longer required for the above-mentioned purposes. If there is any personal data that, for technical reasons, we are unable to delete entirely from our systems, Sonos will implement appropriate measures to prevent any further processing or use of such data. If you have a question about a specific retention period for certain types of personal information we process about you, please send an email to [privacy@sonos.com](mailto:privacy@sonos.com).

## YOUR RIGHTS AND CHOICES

### Your Rights

We want you to be in control of how your personal information is used by us. Subject to local law, including the General Data Protection Regulation and the California Consumer Privacy Act, you can do this in the following ways:

- you can ask us for a copy of the personal information we hold about you;
- you can inform us of any changes to your personal information, or if you want us to correct any of the personal information, we hold about you;
- in certain situations, you can ask us to erase, block, or restrict the personal information we hold about you, or object to particular ways in which we are using your personal information; and
- in certain situations, you can also ask us to send the personal information you have given us to a third party.

Where we are using your personal information on the basis of your consent, you are entitled to withdraw that consent at any time. Moreover, where we process your personal information based on legitimate interest or the public interest, you have the right to object at any time to that use of your personal information.

We rely on you to ensure that your personal information is complete, accurate, and up to date. Please do inform us promptly of any changes to or inaccuracies of to your personal information by contacting [privacy@sonos.com](mailto:privacy@sonos.com).

We will respond to your request as soon as possible but certainly within 30 days. For more information about how you can control the collection and use of [Additional Usage Data](#) and your Communication, Marketing and Advertising Preferences, please visit Your Choices sections below.

We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal information. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to file a complaint with the data protection authority in your country (if one exists in your country) or supervisory authority.

### Your Choices

#### Sonos Account and Sonos App

If you wish to access, edit or remove profile information, change your password, close your account or request deletion of your personal data, you can do it by logging in to your Sonos account or Sonos app or sending an email to [privacy@sonos.com](mailto:privacy@sonos.com). If you cannot access certain personal information collected by Sonos via the Sonos account, the Sonos app or directly via the Sonos Product that you use, you can always contact us by sending an email to [privacy@sonos.com](mailto:privacy@sonos.com). We will respond to any request to access or delete your personal data as soon as possible but certainly within 30 days.

#### Additional Usage Data

You can always opt out of [Additional Usage Data](#) collection by logging in to your Sonos app for iOS or Android. Do it in just a couple of clicks. To opt out please follow the instructions below.

Using the Sonos app for iOS or Android:

1. Select "Settings" tab
2. Open "Data & Privacy" and look for Additional Usage Data option
3. In iOS app, disable/slide off the "Turn usage sharing on". In Android, untick the box that reads "Turn usage data sharing on"

Using the Sonos app on a Mac:

1. From the menubar at the top of your screen click "Sonos" then "Preferences"
2. On the left side of the window, click "Additional Usage Data"
3. Untick the box that reads "Turn usage data sharing on"

Using the Sonos app on a PC:

1. From the menubar at the top of your application window click "Manage" then "Settings"
2. On the left side of the window, click "Additional Usage Data"
3. Untick the box that reads "Turn usage data sharing on"

You may change your preferences at any time following the same steps.

### **Your Communication, Marketing and Advertising Preferences**

You can opt out of receiving direct marketing communications from Sonos by following the instructions included in every email sent to you, via the "Unsubscribe" tab. You can also opt out of email subscriptions or in-app messaging by updating your Profile and Contact Options in your [Sonos account](#). We respect your choice, and we will stop sending you promotional emails once you unsubscribe or change your communication settings.

Please note, regardless of your communication settings, we will continue to communicate with you regarding changes to terms and conditions, policy updates, Sonos Product software updates, routine customer service messages such as information about current or past purchase, delivery of products, service interruptions, data breaches, or other significant information about a Product you own, such as discontinuation of support or safety issues.

You can adjust the amount of interest-based advertising you may receive by changing your [cookie settings](#), [changing your device settings](#), and/or [opting out of certain advertising networks](#). If you have opted out of receiving emails from us, we will not use your email for interest-based advertising activities. For more information about our use of interest-based advertising, please visit Our Use of Cookies and Other Similar Technologies.

### **Advertising and Modern Marketing Tools**

To help more people listen to more music on Sonos, we use several modern marketing tools in support of our advertising efforts.

Sonos may work with third-party advertisers that use [cookies and similar technologies](#) to provide more relevant advertising about Sonos Products and Services on our websites and across the internet. To provide this "interest-based advertising," the parties combine non-personal data about your online activities, acquired over time, which data help cater advertising that we deliver to you. Examples of this may include a Sonos advertisement on a Facebook page, or a Google-owned page such as a search results page or YouTube, or on a site within Google's advertising network. We do

not share your personal information as part of this process. Where necessary, we obtain your consent for this process. At all times, you can opt out of these personalised ads from third-party advertisers and ad networks who are members of the [Network Advertising Initiative \(NAI\)](#) or who follow the [Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising](#) by visiting the [opt-out pages on the NAI websites](#) and [DAA websites](#). Opting out may make the ads you see across the internet less relevant to you. Users that enjoy rights under EU data protection laws can visit [www.youronlinechoices.com](http://www.youronlinechoices.com) to learn how to opt out of having their data used for interest-based advertising by the European Interactive Digital Advertising Alliance (EDAA) member companies. Canadian users can visit [www.youradchoices.ca](http://www.youradchoices.ca).

If you have [opted out](#) of receiving communications from us, we will not use your email for interest-based advertising.

## OUR USE OF COOKIES AND OTHER SIMILAR TECHNOLOGIES

We use cookies and similar technologies like pixels, tags, web beacons, and other identifiers to help us personalise our website for you, remember your preferences, understand how users are using our website or app, and help customise our marketing offerings.

### Cookies

A cookie is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Sonos uses both types of cookies. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted. We use the following types of cookies on our website.

- Strictly necessary cookies. These cookies are essential for you to browse our website and use its features. Without these cookies, services like shopping baskets cannot be provided.
- Performance cookies. These cookies collect information about how you use our websites. This data may be used to help optimise our website and make it easier for you to navigate.
- Functional cookies. These cookies allow our websites to remember choices you make whilst browsing and personalise your experience. We may store your geographic location in a cookie for instance, to ensure that we show you the website relevant to your area.
- Third Party cookies. Third party cookies are those placed by websites and/or parties other than Sonos. These cookies may be used on our website to improve our products or services or to help us provide more relevant advertising. These cookies are subject to their respective privacy policies for these external services, for example, [the Facebook Data Use Policy](#).
- Analytics cookies. We use analytics cookies, like those offered by Google Analytics, to help us understand things like how long a visitor stays on our website, what pages they find most useful, and how they arrived at sonos.com. To learn more about Google Analytics and your data, visit this [Google webpage](#).

[More information about cookies we use on our website is included here.](#)



## How to Control Cookie Settings

Most web browsers allow you to control cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may impact your overall user experience. Some browsers offer a "Do Not Track" ("DNT") signal whereby you can indicate your preference regarding tracking and cross-site tracking. Although we do not currently employ technology that recognises DNT signals, we will only process your personal data in accordance with this Statement. Below you can learn about how to control cookie settings on popular web browsers:

- [Google Chrome](#)
- [Internet explorer](#)
- [Safari](#)
- [Firefox](#)

## Pixels

In addition to cookies, we sometimes use small graphic images known as 'pixels' (also known as web beacons, clear GIFs, or pixel tags). We use pixels in our email communications to you (if you have selected to receive such communications) to help us to understand whether our email communication has been viewed. We also use third-party pixels (such as those from Google, Facebook, and other advertising networks) to help us provide advertising that is relevant to your interests. Learn more about our [advertising and marketing](#) activities below.

## Other Identifiers

When you use our app, we collect a unique ad-tracking identifier from your device (the Advertising Identifier or "IDFA" on iOS devices and the Google Ad ID or "AID" on Android devices) so that we can learn more about users of our app and provide the most relevant messaging and marketing. Although these identifiers are unique to your device, they do not contain any of your personal information such as your name or email address.

## How to control Identifier Settings

You can control how these identifiers are used, including the ability to reset them, through your device settings. Below you can learn about how to control cookie settings on popular web browsers:

- [Apple iOS](#)
- [Android](#)

## HOW TO CONTACT US

If you have any questions about the use of your personal information, please send an email to [privacy@sonos.com](mailto:privacy@sonos.com).

Unless otherwise stated, Sonos, Inc. is a data controller for personal data we collect through the Sonos Products and Services subject to this Privacy Statement. Our address is 614 Chapala Street, Santa Barbara, CA 93101, USA.

Sonos Europe B.V. is our data protection representative for the European Economic Area and Switzerland. The data protection officer of Sonos Europe B.V. can be contacted at the following address: Schuttersweg 10, 1217 PZ Hilversum, The Netherlands or via email at [privacy@sonos.com](mailto:privacy@sonos.com).

## **CHANGES TO OUR PRIVACY STATEMENT**

Sonos may modify or update this Statement when necessary, to reflect customer feedback and changes in our Sonos Products and Service. Please review it regularly. When we update this Statement, we will revise the 'Last Update' date at the top of the Statement. If there are material changes to this Statement or in how Sonos uses your personal data, we will notify you either by posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to regularly review this Statement to learn more about how Sonos is using and protecting your information.