# **Privacy Notice**

Effective Date: July 2018; Last Updated: October 17, 2022

Visit our Privacy Pledge located here to learn more about Arlo's commitment to privacy.

### **Applicability**

This Privacy Notice ("Notice") explains how Arlo Technologies, Inc. and its affiliates and subsidiaries (collectively, "Arlo") collect and use personal information ("Information") and other non-personal information. It applies to our website, mobile app, and any other of our products, hardware, and services (collectively, "Services").

# Why We Use Information

Depending on the nature of our relationship with you and how you choose to use the Services, we may use Information for the following:

We use Information to communicate with you. We use Information to respond to your questions, including questions about our Services or your relationship with us, and to communicate with you about this Notice or our Terms. We may also contact you about your feedback. We use Information you provide to send you alerts and other notifications. If you apply for a job with us, we use that Information to process your application.

We use limited video information for device set up and use to provide Services. We use artificial intelligence to process certain video information from your cameras so that we can monitor your environment, send you alerts, and allow you to further configure your Services. For example, you may configure your Services to send an alert to you based on the type of activity that has been detected. Depending on your subscription plan, configuration and settings, we store the videos you capture for various time periods.

We use Information to provide and improve our Services. We use Information to provide the Services, including emergency response. If you enable your location settings, we may use this location information to support geo-fencing and some Arlo Safe features. We use Information to develop and improve our Services. Your videos are generally accessed by Arlo only through artificial intelligence, but when videos are "donated" to Arlo as described here, Arlo employees or trusted contractors or service providers may potentially view them. You must select individual video recordings from your video library to "donate" to Arlo. If you select this "donate" option, we may use and view the donated video recording for research and product development. We also use Information to analyze trends and customize your experience and do this, for example, by saving certain preferences you choose.

We use some Information for marketing purposes. We use your Information to share updates about new products and special offers, including promotions, surveys, and contests. These updates may include information about Arlo's new features and Services or information about select third-party offers or products we think you might find interesting, but we will not send your Information to these third-parties to use for their own marketing purposes. We'll give you these updates and information through email, on our apps, or on social media platforms.

We use Information to protect our company and users. We use Information to protect our company and users, for example to identify fraud, protect accounts, or protect Arlo's infrastructure. This includes using Information to identify and stop prohibited or illegal activity.

**Our basis for processing Information.** Our basis for processing your Information for the reasons described above is typically to perform a contract, including responding to your requests. For example, this includes providing customer service. Where this applies, if you choose not to provide Information, we may be unable to perform the contract or respond to your request. We also process Information based on your consent. Where you have provided consent, you have the right to withdraw it. We also use Information about you when we have a legitimate purpose in doing so like helping secure and improve the Services.

We also use Information as we may describe to you in the future.

### What Information We Collect

Now that you know how we use Information, below we explain what Information we collect depending on how you choose to use the Services:

We collect account information. We collect Information relating to your account. For example, we collect basic registration details like name and email address when you create an account.

**Other Information you share.** You may also share optional Information with us, like if you choose to provide your address, phone number, or a profile photo in your account profile. If you use emergency response, you may also choose to provide Information to assist first responders. For example, demographic information, preferred language and additional notes such as medical condition or other special needs. We may collect Information about your family or friends if you share your subscription or location with them. If you add an emergency contact we will collect their name and phone number.

**We collect billing information.** When you buy a product or purchase a subscription we collect billing information. For example, your form of payment and billing address.

We collect certain information if you link third party accounts or services. If you chose to connect your Arlo account to another product or service, we may receive Information from the other product or service.

**We collect location information.** For example, we may collect your zip code and state. Based on your IP address, we may also derive location information such as country. If you use Arlo Safe, we will collect precise location information when enabled to provide this service.

We may collect driving event data. If you use Arlo Safe and enable automatic crash detection, we collect sensory and motion data from your mobile device. This may include information from the gyroscope, accelerometer, compass and Bluetooth. This information helps calculate and detect driving events.

We collect feedback and other voluntarily provided Information. We collect Information that you give us when you complete a survey or participate in a contest or promotion. This includes Information given when you write a review or make a suggestion. It also includes your communications with our customer service team. If you post in a public space on our Services, we collect that Information.

We collect device and usage information. We collect Information from and about your device and your interactions with the Services. This includes audio, video and still-image recordings. You can control this as we note below in "Your Choices." This also includes information about any connected third-party devices. For example, the information we collect includes Internet speed, IP address, voltage information, storage information, error rates, length of connection time and other performance information. We also may obtain data collected from the Services' surrounding environments such as motion, temperature, light, or sound. We collect product serial numbers for devices. We collect Information about the browser or device you are using. We may look at what site you came from, or what site you visit when you leave us. We may also collect device identifiers. For example, this might include your operating system and hardware model. This may also include your mobile carrier.

**We collect job application information**. If you apply for a job at Arlo, we collect Information about you, your prior education and work history. We collect your resume and Information about your skills and qualifications for the position.

#### How We Collect Information

Like many other companies, there are different ways that we collect Information. We have outlined them below:

We collect Information directly from you. You might provide us Information in several ways. For example, we collect Information when you create an account or register a product. We also collect Information when you make a purchase, contact us, or participate in a survey. We collect any other Information you voluntarily provide to us when using the Services.

We collect Information passively. We use tracking tools to collect Information from you passively. These tools include browser cookies and web beacons. We use these on our sites and in emails that we send to you. We collect this Information about users over time when you use our Services.

We get Information about you from third party apps and products. Third party products or apps may also share Information about you. For example, certain usage data about your integrated products. We may get sensory and motion data from your mobile device. We may also collect Information about you from other users. For example, your name, phone number, or email address. Arlo users may also provide names and images to associate with friends and family and other household members. If you provide Information about another person, it is your responsibility to ensure you have that party's permission.

**We combine information.** Our Services provide integrated security solutions, which means we may combine information that we have collected across devices, such as hardware, computers and mobile devices. We may also combine information we get from a third party with information we already have. We combine information that we have collected from other third-party sites.

#### When We Share Information

As part of our business there are times that we share Information with others. You can find out more about that below:

We share Information within our family of companies. This includes current and future affiliates and subsidiaries.

We share Information with friends you invite and your emergency contacts. The Services are designed to allow you to share your Arlo device access and alerts if you choose. With Arlo Safe, you may also choose to share your location data. This sharing is done through an invitation link to friends. You can change this sharing on your own through your account settings. If an emergency occurs, we will also share Information with persons you designate as emergency contacts.

We share Information with our service providers. We may share Information with trusted companies who serve as our vendors and help us deliver and operate our Services. Examples of service providers include, sending marketing communications, sales support, and customer support. Depending on the Services you enable, this may also include crash detection, emergency response and dispatch support. It may also include service providers that provide monitoring support. Certain Information (including location) may be shared with these kinds of vendors.

We share Information with connected products and services. You may choose to connect your Arlo account to third-party products and services. You will be asked if you want to grant this connection. If you do, certain information such as device serial number and settings may be shared. You can modify your choice to connect accounts in your account settings.

We will share Information if we think we have to in order to comply with the law or to protect ourselves. We may share Information to respond to a court order or subpoena. We may also share Information when we investigate potential fraud, abuse, or other similar violations of Arlo Terms. We provide Arlo customer Information, including videos, to law enforcement only if legally required to do so. If we have been required to provide your Arlo videos in response to a legally-enforceable search warrant or court order then law enforcement may view the videos and Information.

We may share Information with any successor to all or part of our business. If all or part of our business is sold, we're part of a merger or acquisition, or there is a financing or bankruptcy matter, we may share Information as part of that transaction.

If you post Information on a public page, remember that Information is public. If you participate in a discussion forum or discussion board on an Arlo website, you should be aware that the Information you provide there (i.e., your public profile) will be made broadly available to others and could be used to contact you or send you unsolicited messages, for purposes neither Arlo nor you have control over. Arlo is not responsible for the Information or any other information you choose to submit in these forums.

We may also share information for other reasons we may describe to you.

#### **Your Choices**

You have certain choices about how we use your Information. Those are described below:

You can control certain settings on your mobile device or account settings. For example, you can turn off or modify the location services or push notifications on your mobile phone. You can also customize or turn off your video or audio capture in your account.

**You can opt out of certain marketing.** To stop receiving our promotional emails or communications follow the instructions in any promotional message you receive from us. If you opt out of getting marketing messages, you will continue to receive non-marketing messages from us about your

relationship with us where permitted by law. For example, messages about technical updates and security.

**You can control cookies and tracking tools**. To learn how to manage how we, and our vendors, use cookies and other tracking tools, please click here.

### You May Have Certain Additional Rights

In some places laws grant residents certain additional rights. Read on to learn more about the different rights we offer depending on your location. You can reach us using the contact information listed in the "contact us" section below.

Right to inquire and request deletions. You can contact us to ask us what Information we collect and use. You can also ask us to delete Information we have collected from you. To do this, visit the Privacy Center within your account, access our online form <a href="here">here</a> or contact us at <a href="privacy@arlo.com">privacy@arlo.com</a>. If you delete your account, you will not be able to fully use the Services. We will verify your request by matching Information you provide us with Information we have about you. If you are submitting a request on someone else's behalf we may ask for additional Information. This may include providing a signed letter verifying your right to make this request. We will not discriminate against you because you have exercised any of your rights under the California Consumer Privacy Act.

Sales of Information. Under California law we are required to tell California residents if we "sell" Information as that term is defined by applicable law. Sell means to share Information with a third party for monetary or other valuable consideration. California residents, we do not do this based on our understanding of that term. We do not sell Information of Californians under 16. We also have disclosure obligations in Nevada, and we do not exchange Nevada residents' Information for money. Nevada residents may opt out of any future sale of their Information to a third party by contacting us as described at the end of this Notice.

**Financial Incentives.** We may offer financial incentives to individuals who provide their email address to sign up to receive marketing and promotional emails from us. The terms of the financial incentive will be presented to you at the time you sign up. You may withdraw from any of the financial incentives by clicking on the unsubscribe link in the email messages or by contacting us as described at the end of this Notice. The value of providing your email address will vary and is based on the amount of the purchase using the initial offer and any subsequent offers received.

**European Residents.** If you are an EEA, Swiss, or UK resident, you may have the right to access your Information, the right to correct your Information, the right to request deletion of your Information, the right to request restricted processing of your Information, the right to a portable copy of the Information you have provided, and the right to object to processing of your Information, such as for direct marketing. For more information about exercising these rights, send an email to <a href="mailto:privacy@arlo.com">privacy@arlo.com</a>. EEA and UK residents also have the right to lodge a complaint with a data protection authority if they have concerns about our handling of Information.

## **Transfers and Storage of Information**

Arlo is based in the United States, which means the Information we collect may be processed and stored within the United States. If you live outside of the United States and choose to use the Services, you understand that your Information may be processed outside your country of residence, including in

other jurisdictions (like the United States) that may have different data protection frameworks than your country. We keep Information as long as it is necessary or relevant for the practices described in this Notice and as otherwise required by law. Information we transfer from Europe to the United States is subject to appropriate safeguards under applicable law.

### Children's Privacy

The places where this Notice appears are meant for adults. We do not knowingly collect Information from children. If you are a parent or legal guardian and think your child has given us Information, you can write to us or email us at the addresses provided at the end of this Notice. Please mark your inquiries "Parental Information Request." Parents, you can learn more about how to protect children's privacy <a href="here">here</a>.

### **How We Protect Information**

The Internet is not 100% secure. We cannot promise that your use of our Services will be completely secure. We encourage you to use caution when providing your Information to others and not to share or reuse passwords.

### Third-Party Services and Sites

Third parties may integrate the Services into their products and services, and we are not responsible for this integration. We may link to third-party sites or apps. This Notice does not apply to the privacy practices of these third-party websites or apps. We do not control these third parties. Please read the privacy policies of other websites carefully. We are not responsible for the practices of these third-party products, sites, or apps.

#### **How To Contact Us**

To learn more about our privacy practices or this Notice, please contact us at privacy@arlo.com or write to us at Arlo Technologies, Inc. 2200 Faraday Ave., Carlsbad, CA 92008.

# **Updates**

From time to time we may change our Notice. We will notify you of any material changes to our Notice as required by law. We will also post an updated copy on the places where this Notice currently appears. Please check periodically for updates.