



## Privacy Policy

This Privacy Policy has been updated as of 14<sup>th</sup> May 2018

### Preface

VTech Communications Limited, 9 Manor Courtyard, Hughenden Avenue, High Wycombe, Buckinghamshire, HP13 5RE ("VTech", "we", "us" or "our") is committed to protecting the privacy of users of:

- a) any of our **Websites**, meaning any website or URL of ours that we have linked to this Privacy Policy, including features and content, that are operated by us and made available thereon;
- b) any of our **VTech Software**, any digital software applications and/or platforms made available to you via mobile telecommunications platforms and/or through social networking platforms or app stores and that we have linked to this Privacy Policy;
- c) any of our **VTech Hardware Product**, meaning any VTech Software compatible telecommunications hardware products that we have linked to this Privacy Policy;
- d) **VTech Support**, meaning any support services or information provided on or in connection with the above mentioned Websites, VTech Software or VTech Hardware Product.

To help us achieve our goal of providing the highest quality products and services, we use information from our interaction with you and other customers. We attach considerable importance to protecting your privacy and data supplied by you. Because we respect your privacy, we have procedures to ensure that your personal information is handled in a respectable manner.

We believe that it is important to inform you about our procedures regarding our processing of your personal information. This privacy policy ("**Privacy Policy**"), together with such other terms presented to you in relation to your use of the Websites, VTech Software, VTech Hardware or VTech Support (referred to collectively as the "**VTech Services**"), explains how information is collected, used or disclosed by VTech (on behalf of itself and its group companies (together the "**VTech Group**" and each a "**VTech Group Company**")) in connection with the VTech Services and applies to your use of those services.

This Privacy Policy also governs your use of our Websites and VTech Software. If you do not agree to this Privacy Policy, our Terms and Conditions of Web Site Use, and/or all terms related to our VTech Software, as applicable, then please refrain from using our Websites and VTech Software.



### **Who is VTech?**

The VTech Group is a multi-national organization with legal entities, business processes, management structures and technical systems that cross border. The part of the company responsible for collecting, processing and using your personal data on or in relation to the VTech Services is:

VTech Communications Limited (VTech)  
9 Manor Courtyard , Hughenden Avenue,  
High Wycombe, Buckinghamshire, HP13 5RE  
The email address of VTech is [privacy@vtecheurope.com]

### **Children (individuals under the age of 16)**

#### **A special note to children:**

If you are under 16 and would like to access or use certain parts of the VTech Services, you must get your parent's or guardian's permission before providing us with any personal information, like your name, e-mail address or phone number.

Therefore, please ask your parent or guardian for guidance when using any of the VTech Services. Your parent or guardian will need to know that use of our VTech Services may result in your personal information being transferred to and processed to countries where laws may not provide the same protection as the country where you live.

#### **A special note for parents and/or guardians:**

We want you and your family to have fun surfing our Websites and using our VTech Services and urge you and your family to follow common sense whenever disclosing personal information on our Website, via other VTech Services or anywhere else on the Internet.

### **How do we obtain your personal data?**

VTech's operations include granting licenses for end users to install e-books, games or related (downloadable) software for use on VTech Hardware Products. For these purposes we may process your personal data.

1. **Information you provide to us** - In order to purchase and/or use the downloadable products provided by VTech through the Websites or other VTech Software you need to register. Using your email address and a password of your choice, you may access your account online at any time to add, delete or change some of the information retained in your account. Some products may offer an alternative to having a registered account is being a "non-registered user". As a non-registered user, you do not have the benefit of ordering VTech's (downloadable) products via the Internet. We receive and store any information you transmit to us via the VTech Services or give us in any other way. Do not submit information which you



do not want VTECH to access. Please note, however, that if you do not submit the information required for registration, you may not be granted permission to use certain VTECH Services and/or to download the software made available through the VTECH Services.

2. **Data collected automatically** – We use certain tools that allow us to collect, store and analyse information about your use of our Websites and our other VTECH Services each time you visit the public areas of any of our VTECH Services.
3. **Sensitive personal data** - We do not and will not actively collect sensitive personal data concerning a person's religion or philosophical beliefs, race, political persuasion, health and sexual life or personal data concerning trade union membership.
4. **Order and payment information** - VTECH does not process or store billing information. Payments will be processed by third parties, not VTECH, so VTECH will not collect, process or use payment details (such as credit card numbers or PayPal data). To complete a payment transaction within the VTECH Services users will be directed to third party websites. VTECH does not own, control or operate such sites, and is not responsible for the privacy policies or practices of such sites. The personal data you choose to provide to or that is collected by these third parties (such as credit card or PayPal information) is not covered by this Privacy Policy. Privacy policies and practices for such linked sites may differ from our privacy policy and practices. We urge you to read the privacy policies of such linked sites before disclosing your personal information on such sites.

#### **With whom may we share personal data of your personal data?**

VTECH may share and/or disclose personal data with other recipients, e.g. to be able to provide the VTECH Services or conduct our business operations as described below. When we share personal information, we do so in accordance with data privacy and security requirements. We may occasionally share non-personal, anonymized, and statistical data with third parties. Below are the type of recipients with whom we may share personal data with as well as the reasons why we do this. Your data may be passed on to:

**Within the VTECH Group:** Our businesses around the world are supported by a variety of VTECH teams and functions, and personal data will be made available to them if necessary for the provision of the VTECH Services, account administration, sales and marketing, customer and technical support, and business and product development, for instance. All of our employees and contractors are required to follow our data privacy and security policies when handling personal data. The location processing personal data may include Hong Kong, China, US.



**Our third-party service providers:** We partner with and are supported by service providers around the world. Personal data may be made available to these parties only when necessary to fulfil the services they provide to us, such as software, system, and platform support; direct marketing services; cloud hosting services; advertising; data analytics; and order fulfilment and delivery. Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.

**Third parties for legal reasons:** We will share personal information when we believe it is required, such as:

- To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence, we may share your personal data with them and/or with our legal advisers.
- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings)

Below we have set out each third party recipient of your personal data per applicable purpose.

#### **How does VTech use your personal data?**

Below is an overview of all the purposes for which VTech may process your personal data. To this extent it is indicated:

- 1) which data VTech uses for which specific purpose;
- 2) on which legal basis VTech will process this data;
- 3) for how long the data is stored by VTech; and
- 4) with whom your data is being shared with.

To keep things organized, we have grouped everything by type of data stream.

#### ***Sales, customer management and service centre***

Purpose: Handling complaints, after sales, product enquires

Data: Name, E-mail address, Telephone number, Name, Content of the complaint, Date and place of purchase, Model number.

Basis: performance of contract

Retention period: As long as necessary for applicable purpose



### **What are your rights?**

Under the European General Data Protection Regulation you have a number of rights with regard to your data and their processing:

#### ***Right of access***

You have the right to request a copy of the information that we hold about you and to check that we are lawfully processing it.

#### ***Right to rectification***

You have the right to ask us to correct any incomplete or inaccurate information we hold about you.

#### ***Right to erasure***

We will erase your personal data if you request so and there are no legitimate ground for retaining it.

#### ***Right to restriction of processing/Request the restriction of processing***

You may ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.

#### ***Right to object***

You may object to us processing your information if there is something about your particular situation which makes you want to object. You also have the right to object where we are processing your personal information for direct marketing purposes.

#### ***Right to data portability***

You have the right to obtain your personal data from VTech. VTech will provide these in a structured, commonly used and machine-readable format, which can easily be opened in other common digital systems. This way you can also transfer your data to another provider.

#### ***Right to withdraw consent***

Whenever the basis for a particular data processing activity is your consent, you have the right to revoke that permission. This has no consequences for the past, but does mean that we will no longer be allowed to process this data. Consequently, it is possible that VTech can no longer provide you with certain services.

#### ***Response from VTech***

Any request can be sent to [privacy@vtecheurope.com]. VTech will comply with your request as soon as possible and in any case no later than one (1) month after VTech has received such a request. If VTech rejects your request we will indicate in our reply why the request is rejected.



### **How does VTech secure your personal data?**

We use appropriate technical and administrative security measures to protect your data against accidental or deliberate manipulation, partial or complete loss, destruction, or unauthorised third-party access. Our security measures are being continuously improved in accordance with technological developments. For example:

#### **Policies and procedures**

- We have measures in place to protect against accidental loss and unauthorized access, use, destruction, or disclosure of data.
- We place appropriate restrictions on access to personal information.
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely.
- We conduct Privacy Impact Assessments in accordance with legal requirements and our business policies.

#### **Measures for employees**

- We require privacy, information security, and other applicable training on a regular basis for our employees who have access to personal information and other sensitive data.
- We ensure that our employees and contractors operate in accordance with our information security policies and procedures or any applicable contractual conditions.

### **Does VTech apply automated individual decision-making tools, including profiling tools?**

VTech may apply automated individual decision-making tools. Please remember though that you have the right not to be subject to a decision based solely on automated processing including profiling, which produces legal or similarly significantly affects relevant to you.

### **Does VTech transfer your personal data to third countries or international organizations?**

For (for example) technical and operational reasons, it may be necessary for your (personal) data to be transferred to companies affiliated with VTech outside the European Economic Area. Because the privacy protection regulations there may not provide the same protection as within the European Economic Area, VTech will use the Privacy Shield or the EU Model Clauses to protect your privacy as much as possible. If that is not possible, VTech will ask you for permission to pass on your (personal) data to countries without an adequate level of protection. You can withdraw this permission at any time.

### **How does VTech handle children's personal data?**

We encourage parents and guardians to spend time with their children using the VTech Services and to be familiar with the different features the VTech Services have to offer. The Websites are not



directed to children under the age of 16. If you are under the age of 16, you should review the Privacy Policy with your parent/guardian to make sure you and your parent/guardian understand it.

**What are cookies and how does VTech use them?**

Cookies are small pieces of (text) information that are sent to your browser when you visit VTech's Websites and then saved on the hard disk or in the memory of your computer, tablet or mobile phone (hereinafter: "Device"). The cookies that are placed via VTech Websites cannot damage your Device or the files stored on it. When we talk about 'cookies', we mean not only these small pieces of (text) information, but also other data collections tools that allow us to monitor the use of some of the VTech Services, such as our Websites, including device fingerprinting and "pixel tags"(also known as "tracking pixels" or "web beacons") which are small graphic files. Please be referred to our cookie policy published in our website for further information on how we use cookies and similar technologies.

**May this Privacy Policy be altered?**

This Privacy Policy can be changed. We therefore advise you to regularly read the Privacy Policy for any changes.

**Where can you go with complaints and questions?**

Please contact our Data Protection Officer with any requests about this Privacy Policy and/or related to your personal information. Even if you have a complaint about how VTech processes your data, you can send an e-mail to [privacy@vtecheurope.com]. You can also always contact the competent national supervisor in the field of privacy protection. In the UK this is the Information Commissioner's Office.