

# Privacy Policy

## DALI Privacy Policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

You can visit our site freely without having to register or subscribe for services.

This Privacy Policy contains the following sections:

- Key Terms
- Changes to our privacy policy
- What personal data do we collect about you?
- Cookies & web analytics
- Mobile Applications
- How and why we use your information
- Promotional (Direct Marketing) Communications
- Online advertising
- Who we will share your personal data with
- Retention of your information
- Where is your information held?
- What are your rights?
- Third party links and features
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## Key Terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	DALI A/S, a limited company incorporated in Denmark with company number
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	28156073 whose registered office is at Dali Allé 1, 9610 Nørager, Denmark. We have subsidiary companies in Germany – DALI GmbH, Netherland – DALI Benelux B.V. and in United Kingdom – DALI Audio UK Ltd.
Personal information	Any information relating to an identified or identifiable individual.
Products	Products and/or services which we may supply or supply to you.
Special category personal information	<p>Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership.</p> <p>Genetic and biometric data.</p> <p>Data concerning health, sex life or sexual orientation.</p>

## Changes to our Privacy Policy

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this Privacy Policy. This Privacy Policy was last updated on 23th May 2018.

## What personal data we collect about you?

This Privacy Policy covers the information that we collect and use about you when:

- You access and/use any of our websites including global sales sites, our mobile applications, physical products, software, or other online or mobile service that links to or otherwise presents this Privacy Policy to you.
- You engage with our questionnaires, promotions, surveys or provide marketing responses to our engagement activities.

In order to provide Products we collect information from you and this collection of data may occur when you:

- Place an order for any Products
- Make an enquiry (including about any of our Products or complete a form on one of our websites
- Participate in discussion boards and/or other social media functions on our site
- Sign up to book a demo of our Products
- Products (including associated applications) that you use
- Enter a competition, promotion or survey
- Reviews that you submit about our Products
- Register to use our site and/or subscribe to any of our Products (including Society of Sound, our newsletters and marketing communications).
- Register any of the Products you have purchased from us

- Correspond with us in relation to your account, our Products you have purchased (including post-sales support and warranties)
- Report a problem with our site
- Enquire about or submit an Employment application through our site

### **Information about you**

We collect data from you directly in order to provide Products and this consists of both personally identifiable information as well as anonymised data. The type of data collected depends on the Products you are engaging with and the requirements to deliver that Product.

#### **User Information:**

- Name, address, telephone number and email address (including company name/address if the Product requires this);
- Shipping address, credit or debit card number, verification number, and expiration date;
- Demographic information, including gender and occupation, or special categories of personal data are not actively sought, but may be submitted when you respond to an online job application or marketing survey. It is our policy to limit the information collected to only the minimum information required to complete your submission, and is only processed with your explicit consent;
- Log-in credentials for our user accounts;
- Warranty registration and purchase history;
- User generated content you submit to our public forums (for example, any of our Social Media pages);
- Information about your customer service history with us;
- Any other information you choose to directly provide to us in connection with your use of the Services.

In order to fulfil your shipping requests to third parties (for example, a friend or family member to whom you want to send a Product as a gift), we will use the data you provide about the third party to fulfil your shipment request. It is your responsibility to ensure that third party consents to you transferring their personal information to us.

### **Information about Products supplied by us**

In order for you to download a firmware or software update/upgrade, we will require certain information regarding you and your Product. We collect this information in the following ways:

- Information that you provide to us - this includes Product registration information and information you provide when you subscribe for any of our services and/or use any app or download any firmware or software;
- Information we obtain from you when you use our Products or download our firmware or software - we collect information about your use of the services and/or app, or about the firmware or software you download. This information includes (but is not limited to);
  - Registration/Subscription Information – we may collect information such as your name, address, email address, contact numbers, password, product or device identifiers, preferences and payment details. We use a third party provider to store registration information and we will share your information with them solely for that purpose.
  - Product Setup information - we may collect information about the Product that you are using, such as your model type, firmware version, MAC address (if applicable), BSSID, SSID and encryption mode, network type, Wi-Fi connection, unique Product identifiers, device name and mobile network information. We will associate your Product identifiers with your registration account. We use a third party provider to store registration information and app support information and we will share your information with them solely for that purpose.
  - User Experience Tracking information – we may automatically track your use of our Products in order to provide you with a better experience. We use a third party provider to carry out such tracking on our behalf and we will share your information with them solely for that purpose.
  - Online Logging /Crash Log Information – when you use our Products or download our firmware or software, we may automatically collect and store certain information, including (but not limited to): your global unique identifier; details of how you used our Products and/or downloaded our firmware or software; Product address (MAC address, if applicable); operating system and firmware/software version used; Product information such as settings, browser type and language, system activity, URL, number of Products connected, number of updates, number of resets, and crashes; recovery time and whether recovery was successful. We use this information to provide support services and for developer testing.
  - Auto Update Anonymous Profiling – We may collect anonymous profiling information, including (but not limited to) the Product name and version used, your IP address, CPU speed, operating system, system model, installed RAM, language, network interface card type and description, use of WLAN, use of Touch Input, installation of Net Runtime.
  - Location Information – we may collect information about your country location.
  - Local Storage – we may collect and store information (including personal information) locally on your product or device.

Please let us know if you would like any further details relating to third party processing of your personal data in relation to the above.

### **Information we collect through automated technologies**

We use automated technologies to gather data when you use our Products. This data is processed by both us and third party service providers working on our behalf. The data is collected by both us and our services providers using technologies including (but not limited to) cookies, web analytics and beacons. See also "Cookies & web analytics" below.

### **Websites**

We automatically collect the following information about visitors to our site.

- IP Address
- Date/Time
- Operating System
- Browser ID
- Language
- GeoIP (country from which the visitor is located)
- Landing Page
- Referrer page
- Exit page
- Click tracking
- FAQ Interaction
- Time On Page
- Search Terms
- Downloads

### **Information we collect from third parties**

We may also collect the following information provided by third parties:-

- Publicly available information about you or your business (including through electronic data sources)
- Personal data about you from third parties (e.g. our business partners, dealer networks, sub-contractors in technical, payment, fulfilment and delivery services, advertising networks, analytics providers, and search information providers) to enable us to customise or personalise Products for you.

### **Information we collect from social media platforms**

If you like or follow posts on social media or post to our feeds (including Twitter and Facebook, amongst others) then we may collect information about your account such as name, username, email address and content relevant to our Products.

## Cookies and Web analytics

As part of the automated collection of data, we and our third party service providers may use server logs, cookies, web beacons, Google Analytics and other similar technologies.

For more detail on our Cookies policy please see our policy

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

## How and why we use your information

We use this information to provide support services and for developer testing and this includes sharing this information with third party developers. We store some information on third party services and therefore they hold and pass this information to us. Please contact us for further details.

Under data protection law, we can only use your personal information if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide Products and/or related information to you	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations
To prevent and detect fraud against you or us	For our legitimate interests or those of a third party, that is, to minimise fraud that could be damaging for us and for you
Conducting checks to identify you and verify your identity  Screening for financial and other sanctions or embargoes  Other processing necessary to comply with	To comply with our legal and regulatory obligations

professional, legal and regulatory obligations that apply to our business	
Gathering and providing information required by or relating to enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, that is, to be as efficient as we can so we can deliver the best service for you at the best price
Statistical analysis to help us manage our site and/or business: for example, in relation to customer base, Product range or other efficiency measures	For our legitimate interests or those of a third party: that is, to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to our site and/or systems	For our legitimate interests or those of a third party- that is, to prevent and detect criminal activity that could be damaging for us and for you  To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party – for example, making sure that we can keep in touch with our customers about existing orders and new products
Marketing our Products and, where agreed, those products of selected third parties to: <ul style="list-style-type: none"> <li>existing and former customers;</li> <li>third parties who have previously expressed an interest in our Products;</li> <li>third parties with whom we have had no previous dealings.</li> </ul>	For our legitimate interests or those of a third party, for example, to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party – that is, to ensure our customers are likely to be able to pay for our products and services
Administering, managing and maintaining your accounts and/or subscriptions with us	For the performance of our contract with you or to take steps at your request before entering into a contract.  For our legitimate interests or those of a third party- that is, to be as efficient as we can so we can deliver the best service for you at the best price
Corresponding with you in relation to your account, our Products you have purchased (including post-sales support and warranties)	For the performance of our contract with you or to take steps at your request before entering into a contract  For our legitimate interests or those of a third party -

	that is, to be as efficient as we can so we can deliver the best service for you at the best price
Notifying you about changes to our Products and/or our site	For the performance of our contract with you or to take steps at your request before entering into a contract  For our legitimate interests or those of a third party, that is, to be as efficient as we can so we can deliver the best service for you at the best price
Customising our Products to provide more personalized content	For our legitimate interests or those of a third party, that is, to be as efficient as we can so we can deliver the best service for you at the best price
Measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you	For our legitimate interests or those of a third party - that is, to be as efficient as we can so we can deliver the best service for you at the best price

Note that we may process your personal data for more than one reason (lawful ground) depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific reason we are processing your personal data where more than one reason has been set out in the table above.

The above table does not apply to special category personal information, which we will only process with your explicit consent.

Data may be aggregated into anonymised data sets, which means the data can no longer be linked to any individuals. This analysis may be used for such purposes (but not limited to) as product research, marketing and service optimisation and this anonymised data may also be shared with third parties such as advertising and market research partners.

## Promotional (Direct Marketing) Communications

We may use your personal information to send you updates (by email, text message, telephone or post) about our Products, including exclusive offers, promotions or new Products.

We have a legitimate interest in processing your personal information for promotional purposes (see above "How and why we use your information"). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell it to other organisations outside our group of companies for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- using the 'unsubscribe' link in our emails or
- contacting us at [www.dali-speakers.com/en/contact](http://www.dali-speakers.com/en/contact)



We may ask you to confirm or update your marketing preferences if you ask us to provide further Products in the future, or if there are changes in the law, regulation, or the structure of our business.

## Online Advertising

We may integrate third party advertising platform technologies and services with the data we collect to serve relevant advertising content on the Services and other applications you use. This process may use any of the data collected as set out in this Privacy Policy to deliver the targeted advertising.

These third party partners may place cookies and other auto tracking technologies as part of their service. There may be occasions when we supply our customer information (such as email addresses) to service providers, who may combine the data provided by us with cookies and other tracking data in an anonymised way (e.g. Hashed matching) to enhance their service provision.

We do not have access to or control of automated tracking processes used by third party service providers. To understand options to opt out of these third party service please refer to the Cookies and Web Analytics section of this Privacy Policy as well as online resources for opt out such as Network Advertising Initiative, Digital Advertising Alliance, or Your Online Choices.

## Do Not Track

DNT is a web browser setting that requests that a web application disable its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, analytics companies, ad networks, plug in providers, and other web services you encounter while browsing to stop tracking your activity. For details on setting DNT on your browser of choice, please refer to the help pages or settings for your particular browsers.

## Who we will share your personal data with

We routinely share personal information with:

- companies within our group;
- third parties we use to help deliver our Products to you – for example, payment service providers/gateways, warehouses and delivery companies;
- other third parties we use to help us run our business – for example, marketing agencies or website hosts, marketing communication platforms, analytics and reporting systems;
- third parties which operate review websites which provide you with an opportunity to share feedback on our Products with others.

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### **Service Providers**

We may share your personal data with selected third parties in the following instances

- business partners, dealer networks, suppliers and sub-contractors for the performance of a contract we enter into with them in connection with your account, our products, services (including post-sales support and warranties) and/or our site (including our hosting providers);
- to maintain, develop and/or host your account and/or our site;
- with analytics and search engine providers that assist us in the improvement and optimisation of our site;
- with analytics providers that assist us in the improvement and optimisation of our Products and our site; or
- where we carry out marketing, advertising or surveys to gain feedback and improve our Products and/or our site.

### **Public Forums**

We provide public forums in which it is possible for you to upload content. We reserve the right to use all user-generated content in connection with our Products: for example, comments and images may be used on our site as a testimonial.

### **Retention of your information**

We will keep your personal information while you have an account with us or we are providing Products to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- for product support;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this Privacy Policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

We are committed to the GDPR principle of data minimisation.

### **Where is your information held?**

Information may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: "Who we will share your personal data with").

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal information when this occurs, see below: "Transferring your personal information out of the EEA".

## Transferring your personal information out of the EEA

To deliver Products to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), for example:

- with our offices outside the EEA;
- with your and our service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the Products we are providing to you.

These transfers are subject to special rules under European and Danish data protection law.

We ensure that a similar degree of protection of your personal data is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

If you would like further information please contact us (see "Our Contact Information" below).

## What are your rights?

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances – for example, if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object:

	<ul style="list-style-type: none"> <li>• at any time to your personal information being processed for direct marketing (including profiling);</li> <li>• in certain other situations to our continued processing of your personal information – for example, processing carried out for the purpose of our legitimate interests.</li> </ul>
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the Guidance from the EU on [EUR-lex](#) webpage on individuals' rights.

If you would like to exercise any of those rights, please:

- email or write to our Data Protection Officer—see below: "Our Contact Information"; and
- let us have enough information to identify you – for example, your full name, address and customer or invoice/order number;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

### Third party links and features

Our site may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### Child Privacy

We provide our Products to persons aged 16 and over. We expect those under 16 years to have parental or guardian consent to pass personal information to us. If we are made aware that we have data for people aged under 16 without such consent then we will make all responsible efforts to delete the data in line with our legal obligations.

### How We Protect Your Information

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised 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 suspected data security breach where we are legally required to do so.

All information you provide to us is stored on our secure servers. Any payment transactions are transmitted over a secure encrypted connection (Secure Socket Layer-SSL) and comply with Payment

Card Industry Data Security Standards (PCI DSS). Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## **Employment applications**

We may, from time to time, offer online information about vacancies and employment opportunities. The service may be provided by third party service providers working on our behalf. As such they may also make use of cookies and other means of collecting information, but when done such information is strictly used only for analytics purposes and to facilitate the processing of the application.

Information that we collect in connection with employment applications is handled consistent with this Privacy Policy and any legal obligations to which we are subject. We reserve the right to share your information only for employment purposes, such as evaluating your eligibility or communicating with you about your registered interest.

Any third party partners are required by us to comply with GDPR for data processors with respect to EU residents. Application information will be kept for no longer than 12 months after the application is made, unless agreed otherwise with you.

## **Our Contact Information**

If you wish to contact us or have any questions about or complaints in relation to this Privacy Policy, please contact us at [www.dali-speakers.com/en/contact](http://www.dali-speakers.com/en/contact) or see here for additional global DALI contact information.

If you have any questions regarding this Privacy Policy, believe we have breached a privacy law or wish to exercise your rights (see "What are Your Rights?"), please contact our data protection officer as follows:

- By contact form: [www.dali-speakers.com/en/contact](http://www.dali-speakers.com/en/contact); or
- By post: Data Protection Officer, DALI A/S, Dali Allé 1, 9610 Nørager, Denmark.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

## **Do you need extra help?**

If you would like this notice in another format or another language, please contact us (see "Our Contact Information" above).