

## **Product Privacy policy**

Frontier Smart Technologies Limited (“Frontier Smart Technologies”) values and respects your privacy and is committed to protecting your personal data.

This privacy policy explains how we use and protect your personal data that you give us, your privacy rights and how the law protects you.

This privacy policy was last updated in February 2020. We may update this policy at any time by amending this page. You should check this page from time to time to review any changes we have made.

Frontier Smart Technologies is part of Science Group, an international science and technology business. A list of Science Group companies can be found at the bottom of the page at <https://www.sciencegroup.com/>.

## **What personal data we collect**

We may collect information from you in the course of our business including through your use of our websites, services and apps, your linkage of your device to our systems to set up a list of favourite stations and podcasts, your submission of tickets seeking support for your smart radio, your relationship or interactions with our staff and/or when you engage us or another Science Group company in the provision of services. Some of this information may be personal data.

The personal data that we may process includes:

- Contact information including your email address and phone number;
- Personal identifiers such as your title, name, job title and the company you work for and your year of birth (to verify that you are 16 years or over);
- Social media contact details, such as Skype, Twitter, or other social contact information;
- Your IP address, the Operating System of any connected device (such as Smartphones), the type of any connected device using our services, the version of any operating system and applications, unique hardware and software IDs, your approximate geographic location and the time and date;
- Your favourite stations/podcasts/music and your listening activity;
- Crash traces for any software exceptions that occur;
- Software logs, system performance statistics and network information;
- Product feedback and problem reports that you send to us;
- Marketing information including preferences in receiving marketing from us and our group companies;
- Technical information including IP address, operating system, web browser and other technology on the devices that you use to access our websites, services and apps. Please see our [cookies policy](#) for more details on this;
- Information you provide as part of an enquiry into our services;
- Any other information which you may provide to us.

## **How is your personal data collected?**

- When you use products and applications that use our technology or services or apps;
- When you register with us through our websites or apps that use our technology or services;
- Through your use of “Connected” products such as smart speakers which connect to Frontier Smart Technologies to enable services to be provided;
- When you contact us via email, phone or letter;
- Automatically via technology tools such as cookies and similar technologies;
- In accordance with contractual arrangements in place with you;

- From publically available sources, your references, business-to-business market intelligence companies and other service providers.

### **Purposes for which we will use your personal data**

We collect information from you in the course of our business for the following purposes:

- To provide internet-based services to products and applications that you use;
- To monitor our services to ensure that they remain operational and to help prevent any abusive actions against our systems;
- To contact you with important information about your use of products and apps that use our technology or services;
- To help resolve issues that you have reported to us;
- To understand where, when and how products and apps are used so we can make improvements or develop new products and services that better meet your needs;
- To allow us to provide connected internet-based services to Frontier Smart Technologies products that you own and use;
- To allow Frontier Smart Technologies to monitor our services to ensure that they remain operational and to help prevent any abusive actions against our systems;
- To allow Frontier Smart Technologies to understand where and when products are being used to aid our marketing of products;
- To fulfil our legal and regulatory requirements including establishing, exercising or defending legal claims;
- To respond to your requests, enquiries or complaints;
- To manage and administer our relationship with you and our clients;
- To transmit personal data between Science Group businesses for internal administrative, organisational and operational purposes;
- To prevent and detect fraud and other criminal offences;
- To ensure network and information security;
- To host, maintain and improve our marketing communications website.

We also use your personal data for:

#### *Direct Marketing*

We use your personal data to send you marketing communications about services, publications, science & technology industry updates, events, courses, surveys, promotions and competitions by Frontier Smart Technologies or its group companies and to display content that we believe may be of interest to you.

We will only contact you for these marketing purposes in accordance with our legitimate business interests or where you have explicitly agreed to this. Your agreement to the use of your personal data for these purposes is optional and if you do not wish to provide your agreement, your access to and use of our websites, services and apps will not be affected.

We use a relationship management tool (where legally permissible) to assess the strength of the relationships between Frontier Smart Technologies personnel and our clients or potential clients based on the frequency of the email contact between them. We use that information in order to assess, analyse and improve the services that we provide.

We also use business-to-business market intelligence providers (where legally permissible) to build our business contact networks. We use that information in order to specifically target relevant business prospects to promote our client services.

You have the right to request us not to use your personal data for marketing communications by emailing us at [unsubscribe@sciencegroup.com](mailto:unsubscribe@sciencegroup.com). You can also opt out of receiving electronic communications by clicking on the 'unsubscribe' link at the bottom of any such electronic communication or through following the opt-out instructions provided in any marketing communication.

#### *Use of our website*

There are facilities on our websites and apps which invite you to provide us with personal data including our contact us form and contact email addresses. The purpose of these facilities is apparent at the point you provide your personal data and we only use that information for those purposes.

Our websites also use Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the websites is used to help us improve it. We also use a website tracking software called Pardot which uses cookies to monitor your journey through our websites and remember your preferences when you return to our sites. For more details and information on how to disable cookies, please visit our [cookies policy](#).

#### **Legal basis for using your personal data**

We will only use your personal data when the law allows us to. In particular, we will use your personal data:

- Where it is necessary for our legitimate business purposes provided it does not override your rights and freedoms;
- To perform a contract such as providing you with services;
- To comply with legal and regulatory obligations including for the establishment, exercise or defence of legal claims;
- Where we have received your unequivocal consent.

#### **How long we keep your personal data**

We keep your personal data only for as long as necessary for the purposes for which it was collected, to provide you with services, for legitimate business interests, in accordance with contract, and where required or allowed under law.

#### **Who we share your personal data with**

Any personal data that you share with Frontier Smart Technologies may be shared and processed by other Science Group companies who are located in the UK, Europe, USA, China, Hong Kong and Canada in accordance with this privacy policy and/or in accordance with our contractual arrangements agreed with you.

We also use third-party storage and infrastructure providers and may store your information in their data centres outside the EU. We may also share your information with trusted third parties where we are legally permitted to do so in accordance with this privacy policy and/or in accordance with our contractual arrangements agreed with you including:

- Professional advisors including lawyers, insurers and auditors;
- IT and website service providers including Google Analytics;
- Third party suppliers to help provide services to you subject to the agreed contractual terms between you and us.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow external third party providers to use your personal data for their own

purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also provide your information to regulators and law enforcement agencies where we are legally required to do so and where necessary for the purposes of preventing and detecting fraud or other criminal offences. If legally permitted, we will use reasonable efforts to notify you prior to disclosing your information to such parties.

Frontier Smart Technologies and other group company websites and apps may contain links to third party websites including social media sites such as LinkedIn, Twitter and Facebook. These sites are owned and operated independently from us and have their own separate privacy policies. Any personal data that you provide to these websites will be governed under the terms of the privacy policy of that website. If you use these sites, you should review their privacy policies to learn more about how your personal data is collected and used.

Some of our products provide access to third-party content and services such as Chromecast built-in, Google Assistant, Amazon Alexa, Works with Alexa, Amazon Music, Apple Airplay, Spotify, Deezer, TIDAL, Napster, ALDI life, HOFER life etc. This is not an exhaustive list and not all services are available with all products. To use these services, you must register directly with the third-party service and link the product to your account. When you register with the third-party service provider you agree to their Terms and Conditions and their Privacy Policy and you may provide them with your personal information. This information is held by the third party and not Frontier Smart Technologies. When you use these services with our products, information such as your username, password, IP address, unique hardware and software IDs, operating system type and version and your listening activity may be shared with the service provider. This information is required to provide access to the service you requested. Some of these services provide voice control. Audio recordings created when using these services are sent to the third-party voice service provider. Frontier Smart Technologies does not store any audio recordings. To understand how these recordings are used, please consult the Terms & Conditions and Privacy Policy provided to you by the service provider when you registered with them.

Some of our services such as in relation to the submission of tickets seeking support for your smart radio, are supported by third parties. Use of such services are also subject to such third party's separate terms and conditions and privacy policy, a link to which is provided on the relevant website page.

#### **Which countries do we transfer your personal data to?**

We may share your personal data within our group companies who are based in the UK, Europe, USA, China, Hong Kong and Canada in accordance with this privacy policy and/or in accordance with contractual arrangements agreed with you. This means that we may transfer your personal data outside the European Economic Area ("EEA").

We may also transfer your personal data outside the EEA to other third parties such as third-party storage and infrastructure providers in accordance with this privacy policy and/or in accordance with contractual arrangements agreed with you. Please see the section on "Who we share your personal data with" for more information.

However, we shall only transfer your personal data outside the EEA if one of the following conditions apply:

- The transfer is to a country which the European Commission sees as providing adequate protection for your personal data;
- The transfer is to third parties in the USA who are signed up to Privacy Shield. This requires them to provide similar protection to personal data shared between Europe and the US;
- You have consented to this; or
- There is another legal basis on which we are entitled to make the transfer.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **How we protect your personal data**

Our website is hosted on servers in the UK and/or the European Economic Area. We have appropriate physical, electronic and managerial security measures in place to protect against loss, misuse or unauthorised access to your personal data. We use network access control technology to limit access to the systems on which personal data is stored, and our IT team monitor for possible vulnerabilities and attacks. However as the transmission of information via the internet is not completely secure, we cannot guarantee the security of your information transmitted to our website.

We note that the information you provide may be confidential and we will not sell or otherwise make your personal data commercially available to any third party except that we may share information with third parties. Please see the section on 'Who we share your personal data with'.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the UK Information Commissioner's Office where we are legally required to do so.

### **Your rights regarding your personal data**

You have the right (subject to certain exceptions) to:

- Access, correct, delete, update, rectify or restrict your personal data;
- Object to our use and processing of your personal data or withdraw consent that you have previously given;
- Request the transfer of your personal data to you or a third party;
- Ask any questions about our use and processing of your personal data.

Please email us at [privacy@sciencegroup.com](mailto:privacy@sciencegroup.com) and we will provide you with all rights that you are entitled to in respect of your personal data and any exceptions that may apply.

Please note that we may ask for further information from you in order to prove your identity before disclosing any personal data to you. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request.

If you are unhappy with the way that we have handled your personal data, you have the right to make a complaint to the authority responsible for data protection in the country that you are based. Contact details should be available online or you may alternatively ask us for assistance.

### **Our contact information**

If you have any queries in relation to this policy, please contact us at:

Attention: Data Protection Officer

Address: Harston Mill, Harston, Cambridge, CB22 7GG, UK

Telephone: +44 1223 875200

Email: [privacy@sciencegroup.com](mailto:privacy@sciencegroup.com)

If you currently receive marketing information from us which you would prefer to not receive in the future, please email us at [unsubscribe@sciencegroup.com](mailto:unsubscribe@sciencegroup.com)

Frontier Smart Technologies Limited is registered with the UK Information Commissioner's Office under registration number Z8964123