### Sonos, Inc. Privacy Statement

Last updated: June 2024

We deeply respect your privacy and right to control how and if your personal data is used. 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 it 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, giving you the ability to play music with your voice or the touch of your smart home system, or offering you 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.

This Privacy Statement ("Statement") explains the personal information we collect from you, either directly or indirectly, and how we use it. This Statement also covers 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 Sonos Voice Control ("SVC"), the Sonos website, Sonos Flex, and Sonos Radio (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, Pixels, 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 Support group for assistance with your Sonos Products.

#### Information we collect from our Products or Services

Sonos Products are media devices which are designed to connect to each other (a "Sonos System") as well as to music and other content delivered through media servers in the cloud. Accordingly, there is a certain amount of information which will always need to be collected for the Sonos Products to function as intended ("Functional Data") (as further outlined below). Beyond Functional Data, there is additional data (e.g. telemetry data) which we encourage our customers to share as it helps us improve your experience with Sonos Products and offer better, personalized Sonos Products and Services ("Additional Usage Data") (as further outlined below). When you visit our website, we may collect information about you by using cookies, pixels and other similar technologies. 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. To learn more about how we use cookies, pixels, and similar technologies, see below.

### 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.

#### **Our Customers**

Sonos does not target and is not intended to attract children under 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 by a parent or guardian or discovery by other means, a child under sixteen has been improperly registered on our site 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 information from customers. The relevant sections in the Statement apply to you to the extent you use certain Products and/or Services and they are made available to you in your region.

#### **Learning about Sonos**

As you gather more information about Sonos, you may virtually or physically engage with us on an open platform. Examples include browsing our website, engaging with our social media channels, and calling our sales representatives. 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 <u>cookies</u>, <u>pixels</u>, <u>and similar technologies</u> when you visit our websites.

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

**Why:** We use this information to share news about events and products offered by Sonos or our partners, and provide you with more customized advertising and marketing offers. Additionally, the IP address helps us to understand geographic information about our websites' visitors better so that we can improve our website for everyone. It is in our legitimate interest to process your personal data for these purposes.

# **Buying Sonos Products and Services**

Once you have decided to buy a Sonos Product and/or Service, we offer a way for customers to buy directly from us at www.sonos.com When you buy from us, you will be asked to provide information so that we can complete your purchase.

**We collect:** your name, phone number, email address, delivery/shipping address, company information (optional), and payment information including billing address (if different from shipping), credit card information. Why:

Why: We use this information to complete your transaction, follow up with you about your purchase, help with any delivery issues, handle returns, and other issues related to the purchase of your Sonos Products and/or Services. Processing your personal data for this purpose is necessary for the performance of the contract 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 and Services.

### **Setting up your Sonos Product**

At Sonos we offer different types of audio products, some of which are primarily designed to be used as part of a broader Sonos System (most often in the home)("System Products") and others which are intended to be used primarily as an individual product (including outside of the home) and may be used in Bluetooth mode only ("Individual Products").

#### **System Products**

Once you receive your Sonos System Products, you will be required to connect your Sonos System Product to a local network. Each Sonos System Product needs to be connected to the internet for setup. As part of the initial setup, you will be asked to download the Sonos App from either our website or a third-party website, such as the Google Play 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 setup process, the Sonos App will ask you to set up an account and register your system with Sonos. You must register your Sonos System Products in order for your Sonos System Products to work.

As part of registering any 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 Products or 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 individual Sonos Product serial number and the IP address from where the Sonos 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, language preference, Product serial number, 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 and/or Service working securely (which helps prevent unauthorized access to your Sonos Products, Services or home network). This processing is necessary for the purposes of our legitimate interest of ensuring network and information security when you are provided with Products and Services. Specifically, a Sonos account is necessary to authenticate users and to ensure that a specific device is linked to a specific account and user. As part of our legitimate interest assessment, Sonos performed a balancing test. You can obtain information about this balancing test upon request, by sending an email to privacy@sonos.com. Also, we collect this information 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.

### **Individual Sonos Products**

Once you receive your Sonos Individual Products, you may use them out of the box by connecting the Individual Product to a Bluetooth-enabled device. Prior to registering your Individual Product to a Sonos System, we do not collect any information when you use your Individual Products in Bluetooth mode, however other services such as the device you connect to may collect certain information (for example your phone). Please see any privacy statement that accompanies such device for information about how such data is handled. You may continue to use your Sonos Individual Products in Bluetooth mode for as long as you like. If you decide to connect your Individual Products to your Sonos System, the devices will then behave like a Sonos System Product and we will collect data in the manner outlined above in the "System Products" section. For purposes of the remainder of this Privacy Statement, an Individual Product which has been connected to a Sonos System shall be considered an System Product and data shall be collected in the manner outlined herein for System Products.

### **Using Sonos Products and Services**

At Sonos we believe you can enjoy great Products and Services without compromising your privacy. Learn more about how we use your personal information here.

Learn more about how we use your personal information here. The information we collect from your Sonos System (including Sonos System Products, Individual Products that have been registered to your Sonos System, or the Sonos App) includes Functional Data, Advanced Feature Data, and Additional Usage Data. There are three main reasons we collect this information from your Sonos System 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 (e.g. app, voice) which is necessary for the performance of the contract we have with you, and (3) to make your Sonos Products and Services better over time which is in our legitimate interest.

#### **Functional Data**

Sonos System Products work by connecting to a local WiFi network which allows you to stream music from a music service to one or more of your connected System Products. In order for these System Products to function properly, there is a certain amount of information that must be collected by us and routed through servers in the cloud. This includes:

- 1. Registration Data. This data includes your email address, location, language preference, product serial number, IP address, and Sonos account login information (as described above).
- 2. System Data. This data includes things like Product type, controller device type, controller operating system, software version, security state, 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, information about Bluetooth, system settings (such as equalization 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 Products in different rooms, whether your Product has been tuned using Sonos Trueplay technology, system performance metrics, WiFi Security Mode, (e.g. the temperature of your Product or WiFi signal strength) and error information.
- 3. Content Management and Activity Information. This data includes information about your music services and music service use, Product or room grouping information, content control information (such as play, pause, change volume, or skip tracks), and information about playlists, recently played, favorites, "now playing" and track data, (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 (see the Advanced Features section below).

# Why we collect Functional Data:

We collect this information to help ensure that your Sonos Products are working properly, to provide you with customer support and to honour your audio commands and preferences which is necessary for the performance of the contract we have with you. We also collect this information to guide product improvement and customer support decisions which is our legitimate interest.

# **Advanced Features**

To get the most out of your Sonos system and enable all functionality, there are certain features for which additional data will be shared with us when you use the applicable feature. For these advanced features you have the option to not use the feature, which will minimize the data we obtain about your Sonos System. These features include:

- 1. Voice Control. If your Individual Sonos Product is voice capable (not every product is voice capable), you will have to actively enable voice control for your Sonos System Product to utilize the voice feature. Voice control works by your voice-enabled Sonos Product 'listening' for a key wake word. In greater depth, this means that the voice-enabled Sonos Product continuously buffers (stores data for the time that it is being processed) locally, without transmitting or storing any information, unless it detects the wake word or phrase ("Hey Sonos" or "Alexa") which triggers the device to begin processing the vocal request (for third-party voice control, see below). If the Sonos Product does not detect the wake word, it continues to record over itself in a never-ending loop lasting a few milliseconds. This is all done locally on your Sonos Product and is not sent to Sonos or any third party. If a wake word is detected, the Sonos Product begins processing the vocal request. In other words, it does not retain any audio data, or begin to transmit any data until it is 'woken up'.
  - A. Sonos Voice Control. If the detected wake word is "Hey Sonos", your voice command is processed locally on your product and no audio data will be saved. Both the voice recording and transcript are never sent to the cloud and Sonos does not retain a copy or transcript of your voice recording.
  - B. Third-Party Voice Control. If the wake word is the one of a Third-Party Voice service you have activated (e.g., Alexa), once the wake word is detected, the recording of your voice command is then sent to the voice partner you have authorized to receive such recording (for example, Amazon). Sonos does not retain a copy or transcript of your voice recording. Use of any Third-Party Voice service is subject to the third party's 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.

Sharing the relevant data with these partners and further processing such data is necessary for the performance of the contracts with these partners for your benefit, in order to ensure that the voice control function is working properly. This information is needed to fulfill the agreement we have with you, to ensure proper functionality, and to help improve these features which is also our legitimate interest.

2. Sonos Radio. To help our customers get the music playing quickly once you take a Sonos Product out of the box, we offer an advertising supported content service called Sonos Radio. If you choose to use Sonos Radio, we will collect information about track and station data and location-based information when using Sonos Radio. Collecting this data is necessary for our licensing and reporting obligations as

well as advertising purposes and is our legitimate interest. For more information on this, please visit <u>Provide Sonos Radio Service</u>.

### 3. Home control Integrations

For customers who wish to control their Sonos System using a home control product (e.g. Lutron), you will need to go through a process to connect such devices with your Sonos system (similar to the process you go through to connect a music service). Once enabled, we collect and process the Functional Data and Sonos will share a subset of this data with the partner/s that provide/s the services you have requested.

Sharing your relevant data with these partners and further processing such data is necessary for the performance of the contracts with these partners for your benefit, in order to ensure that the direct control function is working properly. This information is needed to fulfill the agreement we have with you, to ensure proper functionality and to help improve these features which is also our legitimate interest.

### 4. Trueplay and Audio Optimization

A. Trueplay. Trueplay is a feature we offer which analyzes acoustic factors that can impact sound quality in the room where your Sonos Products are placed to optimize the sound quality that comes from your Sonos Products (regardless of where they are placed within the room). In order to use this feature, you will have to enable Trueplay in the Sonos App. To do this, a user goes through an interactive process (watch the video here) that gathers certain data about your speaker setup (for example, the number of speakers and speaker placement), including information about background noise levels and the room acoustics (for example decibel level at each frequency). This information is used to help make sure that the tuning gives you the best sound output possible. The collection of this data is necessary for the fulfillment of the agreement we have with you if you activate Trueplay.

Once enabled, some of the Products can automatically adjust their sound for your environment with Auto Trueplay ("Auto Trueplay"). Auto Trueplay starts tuning as soon as you begin playing audio. It automatically re-tunes as you play content and bring your Auto Trueplay-enabled Product to different locations.

B. Voice Audio optimization. Concurrent with any voice activity, Sonos System Products 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 while music is playing, for example, Sonos may improve the technology by lowering the music so that your voice command can be understood properly.

#### Additional Usage Data.

In addition to the information that is required for your Sonos Products to work as outlined above, there is "Additional Usage Data" about your Sonos System Products that you may choose to share with us to help us improve the product experience for all of our Customers. If you opt to share the Additional Usage Data with us, we collect information about performance of your Sonos Products and/or System. This includes things like controller configuration data such as app preferences which capture the state of different settings inside the Sonos app, information about how often you use the Sonos app versus other control mechanisms (voice, etc.), flow of interactions within the Sonos app, controller device settings which capture the state of device-level (e.g. iOS, Android) settings that affect our App (e.g. the state of the system-level permission for Bluetooth, location, etc.); how often you use the physical controls on the unit; how often certain features are used in the Product, reliability data (including WiFi performance), types of HDMI devices connected to the product and audio formats used, hardware faults, duration of Sonos Product use, and, as required for certain Services location-based data using GPS (or similar technology, where available), crowdsourced WiFi access points and cell tower locations collected from your third-party device when the Sonos App is in use.

# Why we collect Additional Usage Data.

We collect this information so that we can help ensure Sonos Products are functioning properly, provide a personalized 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. You may opt out of sharing this information with us by following the steps listed here.

#### **Getting Help from Sonos**

From time to time, you may decide to contact our Customer Care group for assistance with your Sonos Products and/or Services. 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, Bluetooth 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 inquiries 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 your data is necessary to fulfill 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 personalize 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 our agreement we have with you.

### Product Experience, Recommendations, and Personalization

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 personalize your experience with Sonos Products and Services. This processing is necessary for the performance of our agreement we have with you, as well as to serve our legitimate interest.

### **Customer Care**

We use data to respond to customer inquiries, diagnose Product problems, repair customers' Sonos Products, refine Customer Care support tools (for example chatbots), and provide other customer care and support services. When you engage with our customer support team, we may use tools such as chatbots which may request certain information from you to help resolve any issue you are experiencing. This processing is necessary for the performance of our agreement we have with you, as well as to serve our legitimate interest.

# **Product and Service 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 prioritize. 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 Sonos Voice Control Service**

When you use Sonos Voice Control via our Sonos Voice Control-enabled Product, we collect and process certain:

- audio data (e.g. ongoing/continuous processing of audio data when speaker is in the 'listening mode', but only when the microphones are enabled); all audio data is processed locally on your SVC-enabled Product; audio data is not sent to the cloud and never leaves your SVC-enabled Product;
- 2) in-app activity information (e.g. product or room names, listened, saved and/or liked tracks/songs, artists, albums, playlists); some of this data will be processed in the cloud:
- 3) usage data (e.g. registration data such as IP address or language preference, system data such as device bonding settings, grouping, names of music services, product types, room names as well as voice control usage data which means details of what was understood for each sessions such as 'play music', 'volume up/down'; Sonos does not create, process or store transcripts of any audio recordings; transcripts never leave your SVC-enabled Product).

We collect and process this information in order to deliver SVC functionality, respond to your requests, and to personalize the speech recognition vocabulary on your SVC-enabled Products (and only yours). This processing is necessary to deliver SVC functionality and for the performance of our contract with you. For more information on this, please visit The Legal Bases for Using Personal Information.

## **Provide Third-Party 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 the third-party terms of use or service and their respective privacy notices. We encourage you to read the 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 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), location data, age, gender and other listening activity (e.g. listening session length, stations listened to, and tracks listened to and skipped) within Sonos Radio. We collect and process this information in order to provide you with a customized experience, respond to your requests, provide the requested service to you, to determine relevant licensing obligations, to serve marketing communications, for advertising purposes and to improve Sonos Products and Services. Additionally, your IP address and an anonymized ID will be provided to third-party radio content providers to provide you with access to radio stations and a subset of the data mentioned above (e.g. approximate location based on postal code, age, gender, device ID) may be shared, depending on which version of Sonos Radio you use - paid

vs. free - with advertising partners for advertising purposes. 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 and its partners' collection, use, transmission, processing and maintenance of location and account data at any time by not using Sonos Radio and/or 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 personalize our communications with you. For example, we may contact you by email or other means of electronic communication (including but not limited to, through the Sonos App, and Sonos Products via voice 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.

We use tools, including third-party service providers and social media platforms, that help us identify and reach out to existing and new customers, by matching a hashed (a pseudonymized technique) email address, which was shared by you with us, with data these third-party service providers and/or social media platforms already have about individuals and with people on social media platforms to create so called "Custom Audiences" (this enables us to send targeted ads to our customers) and "Lookalike Audiences" (this enables us to send targeted ads to people who have similar profiles and/characteristics as our customers). By sharing your email address with us, you agree that we may share your pseudonymized contact data (e.g. email address) with social media partners to improve the marketing experience. You can opt out of such data sharing by sending an email to privacy@sonos.com.

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 <u>cookies</u>, <u>pixels</u>, <u>and similar technologies</u> 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 Sonos 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, analyzing 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 authorized 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.

#### **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 businesses, 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 the functionality and/or provide customer support. Please note that functionally 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.

### 1) 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 Content Management and Activity Information with music and/or other audio content services that you have authorized 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 fulfill the agreement we have with you.

### 2) Control Partners

If you have enabled control of your Sonos System using a third-party control mechanism (e.g. home automation controllers), we may share relevant Content Management and Activity Information with control partners that you have authorized to interact with your Sonos System. Sharing data with control partners as instructed by you is necessary to fulfill the agreement we have with you.

#### 3) Voice Partners

Once you have activated a third-party voice service, we may share relevant Content Management and Activity Information and Audio Data with voice control partners that you have authorized to receive such data, in order to control your Sonos system. Sharing data with voice 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 psuedonymized and anonymized 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 may share the following information with our advertising partners: location and language of the registered Sonos user, station genre, listening audience data in the aggregate (anonymized), and limited location information and identifiers (i.e. an IP address) 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.

Additionally, we may share information with social media companies as outlined above in the "Communication, Marketing, and Advertising" section.

#### **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 organizations, our affiliates or in legal proceedings. We will share your personal information when we in good faith believe it is

necessary for us to do so in order to comply with a legal obligation under applicable law or 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 analyses.

Please note, our Sonos 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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>.

#### 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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>. 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 analyze 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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>

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

### Security

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

We use a variety of appropriate technical and organizational measures and industry standards to protect your personal information and help prevent information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities. Additionally, we 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 transmission over the Internet. Moreover, your password is stored using a 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 your personal information, you must keep your password confidential and not disclose it to any other person. Please alert us immediately if you believe your password has been misused. Additionally, 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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>.

### **Storage**

Personal data collected by Sonos may be stored and processed in your region, in the United States (for instance 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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>.

#### 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 may request we:

- provide access to or a copy of the personal information we hold about you;
- correct any of the personal information, we hold about you that is out of date or incorrect;
- in certain situations, 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, send the personal information you have given us to a third party (where technically feasible).

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 current. Please do inform us promptly of any changes to or inaccuracies of your personal information by contacting <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>. Please contact us at this email address if you want to submit any data-related questions. 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 <u>Additional Usage</u> <u>Data</u> 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 lodge a complaint with the data protection authority in your country (if one exists in your country), or supervisory authority, or bring a civil action against us in accordance with the applicable laws.

#### **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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>. 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 <a href="mailto:privacy@sonos.com">privacy@sonos.com</a>. 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**

If you do not use any Advanced Features (e.g. Sonos Radio, Voice Control), and/or services for which the Additional Usage Data is required to enable its respective functionality, you can always opt out of <u>Additional Usage Data</u> 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. Note that certain Sonos Products may have a distinct opt-out toggle which will apply to only that Sonos Product.

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 the IOS app, select whether you want to adjust the Additional Usage Data for your System (i.e., all System Sonos Products associated with your Sonos System) or for specific Sonos Products. Then disable/slide off the relevant slide button. In Android, 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 email marketing communications from Sonos by following the instructions included in every email sent to you via the "Unsubscribe" tab. 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, opting out of certain advertising networks, or by going to the "Your Privacy Choices" in the footer of www.sonos.com. 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 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 to this process depending on local law. At all times, you can opt out of these personalized 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.vouronlinechoices.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.

#### OUR USE OF COOKIES, PIXELS, AND OTHER SIMILAR TECHNOLOGIES

We use cookies and similar technologies like pixels, tags, web beacons, and other identifiers to help us personalize our websites for you, remember your preferences, understand how users are using our websites or app, and help customize 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 recognize 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 optimize our website and make it easier for you to navigate.
- Functional cookies. These cookies allow our websites to remember choices you
  make and personalize your experience. We may store your geographic location in a
  cookie, for instance, to ensure that we show you the websites 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 websites 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 websites, 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 may indicate your preference regarding tracking and cross-site tracking. Although we do not currently employ technology that recognizes 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
- <u>Safari</u>
- 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 <u>advertising and marketing</u> 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 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:

- App iOS
- Android

#### How to Contact Us

If you have any questions about the use of your personal information, please send an email to <u>privacy@sonos.com</u>. California residents can also reach us toll free at 1-800-680-2345.

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 301 Coromar Dr, Goleta, CA 93117, 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: Groest 106, 1211 EE Hilversum, The Netherlands or via email at 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 Updated' 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.