



Welcome to Philips Smart TV!

Introduction

This Philips Smart TV is presented to you by TP Vision Europe B.V., located at Prins Bernhardplein 200, 1097 JB Amsterdam, The Netherlands, which is part of TPV Technology Limited in Taiwan. We are the exclusive brand-licensee of “Philips” for televisions in (among others) Europe. This privacy statement applies to processing carried out by TP Vision Europe B.V. as a data controller or as a joint data controller.

With your Smart TV you can watch broadcast programs or movies, Video-on-Demand, link to social media and cloud solutions and use a number of APPs. To enable you to use many of these Smart TV services and for us to be able to maintain and improve these, we and third parties need to collect and process data which is regarded as Personal Data and place and read cookies on the Smart TV. For the processing of Personal Data related to the use of your Smart TV and Smart TV Services provided by us, TPV is the data controller. In this Privacy Statement we will further explain to you:

1. what kind of Personal Data we collect,
2. for which purposes we use it,
3. for how long we keep it and how we keep it secure.
4. about the cookies we and other third party companies use on your Smart TV
5. your rights and how to contact us.

Your Smart TV also contains pre-installed features by third parties. These third parties may act as joint controller with us or as an individual controller, which we will further explain in this Privacy Statement. For some of the key terms we have provided a definition on the last page. It is advisable to read these key terms section before continuing.

If you don't want us, or any third party mentioned in this Privacy Statement to process your personal data, you can always choose not to use the Apps or any of the connected services and disconnect the Smart TV from the internet.

1. How to contact us

You can contact us with any questions you may have about the processing of your Personal Data or the use of cookies by us, or to exercise your rights as mentioned in this Privacy Statement, at:

TP Vision Europe B.V.

Att. Data Protection Officer

Prins Bernhardplein 200

1097 JB Amsterdam



The Netherlands

or by mail at: privacy@tpv-tech.com

2. Collection and use of Personal Data

In this chapter we are explaining for what purpose we are collecting and using Personal Data. We have categorized the information in this chapter as follows:

- Smart TV operation and maintenance
- When you use Apps
- Linking with social media and personal cloud solutions
- Statistics to help us improve
- Recommended content and advertisements by Samba TV
- Relevant advertising

2.1 Smart TV operation and maintenance

During first installation, or when Smart TV services are started for the first time, the Smart TV will connect to our and our third parties servers to register. During this registration, these servers will allocate several unique numbers to the particular Smart TV so that the Smart TV is recognized when it connects to the servers again.

The legitimate ground for processing this Personal Data is our legitimate interest to offer the service to you and that you do not have to go through the registration process each subsequent time your Smart TV is started.

The Personal Data we collect are: the Smart TV IP-address, Consumer-ID, Device-ID, serial number, MAC-Address and the country and language configured on your Smart TV and the time and date of accessing the servers.

We use this data to provide you with the basic Smart TV services. This includes among others authentication of the Smart TV and when you contact us for support, abuse handling, management of security incidents and monitoring of availability of the Smart TV services and distributing software upgrades, and for being able to store and back-up your user preferences. To deliver the basic Smart TV services to you, we are working with several internal and external suppliers. You can find a list of these suppliers on our website: https://www.tpvision.com/policy/smarttv_suppliers.pdf.

The legitimate ground for processing this Personal Data is our legitimate interest to offer good, sound quality products and services to you in conformity with your expectations and our other customers.

When you browse sites with your Smart TV, we store the URLs visited so that we can show you a thumbnail (small image) of frequently visited sites and auto-complete addresses.



The legitimate basis for processing this Personal Data is our legitimate interest to offer good products and services to you and our other customers.

We store this information for as long you continue to regularly use your Smart TV. If you no longer use your Smart TV, we delete the data after nine months (this is due to the lengthy period required to solve complex issues). The information is kept in a pseudonymised format for 2 years, after which it will be permanently deleted.

2.2 When you use Apps

When you use an App, the third party that offers that App may receive your Device-ID, IP-address, login details and the language and country configured on your Smart TV. To better understand how this information is used and for how long it is stored, please take a look at the privacy policy of the company that offers the App.

2.3 Linking with social media and personal cloud solutions

You can link your Smart TV with social media applications, like Twitter™ and with personal cloud solutions, like Dropbox™. In order for us to make that connection, we need to create a so called Smart TV ID, which include a unique identifier, chosen username, pin-number and the authentication code of the application. Every time you want to log-on to the application, you will be asked to create a Smart TV ID, except for when you choose the Remember Me Always option. In that case you are asked for a chosen pin-number. A persistent Cookie (two years) will then be installed on your Device, remembering your Smart TV ID. When you log-out, this Cookie is deleted. Users of your Smart TV can all create a different Smart TV ID. Please note that some functionalities as shown in the Social and Cloud Explorer App are offered by third parties, such as Twitter and Dropbox, which are outside our control, and subject to their own privacy policies and notices.

2.4 Statistics to help us improve

For some Smart TV's, when you first install your Smart TV, we ask you to agree sharing analytical data with us. In case you give us your consent we collect analytics data like "app click behavior", "channel zap behavior" and other interaction that you may have with your Smart TV, for example the time and date of a "click" in the Smart TV menu. It will also store data on hardware/software related failures and the information on the interaction with your Smart TV just before the failure occurred. Your Smart TV will send this information to our servers for the purpose of problem solving and to use experiences for future improvements of our products.

The legitimate ground for processing this Personal Data is to offer good products and services to our customers now and in the future.

We store this Personal Data for a maximum of 9 months after collection (this is due to the lengthy period required to solve complex issues). The information is kept in a pseudonymised format for 2 years, after which it will be permanently deleted.



Your Smart TV will send this analytical data to our servers via an encrypted internet connection and it will consequently be stored on a secure server.

Our standard setting is that you agree to share analytical data with us. However, you can at all times decide to stop sharing or prevent this. Just go to the Privacy Center, select the setting for “The Statistics for Improvement of Smart TV service” and empty the relevant click box. When you have done so, your Smart TV will no longer share analytical data with us.

2.5 Recommended content and advertisements by Samba TV

If you say yes to “Enable Personalized Content” in the Privacy Center, “Samba TV” (Free Stream Media Corp., 301 Brannan St, San Francisco, CA 94107, USA, www.samba.tv) may serve you personalized program information, content recommendations and advertisements or other media content on any devices (i.e. your SmartTV, smart phone or tablet) under the same IP-address based on your viewing interests.

These recommendations are based on app click behavior, channel zap behavior and other interactions that you have with your Smart TV, like time and date of a click in a menu, and information about your Smart TV itself like the model number.

If you decide to turn on “Enabling Personalized Content” you consent that we can obtain this data and provide it to Samba TV to use it, until you turn it off again. You can at all times decide to stop sharing. Just go to the Privacy Center on your Smart TV, select the setting for “Enabling Personalized Content” and click on Don’t Accept. When you have done so, your Smart TV will no longer share analytical data with Samba TV. Please be aware, since we do not control how Samba TV uses the Personal Data that they receive, we advise you to read Samba’s privacy policy, which you can find at <https://samba.tv/legal/privacy-policy/>.

2.6 Relevant and targeted Advertising

Selected third parties may use our advertising server to serve you advertisements on the Home Menu and within App’s. This server will send a request to advertising platform providers and advertisers and these providers will subsequently issue impressions to your SmartTV, which are selected based on data already available of you, which is automatically generated from their own and third party databases. Such requests may contain your IP-Address, your Device-ID and your IDFA. Some of these advertising platform providers and advertisers also use cookies or pixels for tracking purposes.

The most accurate list of advertisement platform providers and advertisers can be found at https://www.tpvision.com/policy/platformproviders_list.pdf.

You can at any time change your setting for “Relevant Advertising” in the Privacy Settings. When you say no to “Relevant Advertising”, advertisements will still be served on your Smart TV but no personal data or tracking data will be shared and you may be looking at the same advertisement twice or more often.



2.7 Optional features offered by third parties

Depending on the country you live, your Smart TV may contain extra features. We do not act as a data controller for Personal Data processed by the third party providing the feature. In relation to the data collected through these features, the relevant third party will act as data controller.

Your Smart TV may contain the ACR Feature, which is switched off as a standard setting when you first install the Smart TV.

If you enable the ACR Feature to collect viewing data in the Viewing Data menu, “Inscope” (Inscope Data Limited, 10 Earlsfort Terrace, Dublin 2, D02 T380, Ireland) will collect data related to publicly available content displayed on your Smart TV, such as the identity of your broadcast, cable, or satellite television provider, and the television programs and commercials viewed (including time, date, channel, and whether you view them live or at a later time) and the location of your Smart TV. Unique identifiers about the Smart TV, including the IP address, will also be collected.

You can revoke your consent for the collection of viewing data in the Viewing Data menu of your Smart TV at any time. Turning it off will not affect the performance of your Smart TV or any other online services.

We, TP Vision Europe B.V., do not supply this data to Inscope and do not otherwise collect or process data via the ACR Feature. Consequently in relation to this viewing data collection Inscope is the data controller and we are not. If you consent to the use of the ACR Feature Inscope obtains the viewing data directly from the Smart TV. Inscope processes viewing data as set out in the Inscope privacy policy. Please consult their privacy policy at <https://www.vizio.com/privacy>.

Inscope may share this data with analytics companies, media companies and advertisers to: (i) deliver advertising and promotions relevant to your profile that you might find useful (both on your Smart TV and other devices sharing your IP address, e.g. phones and tablets); (ii) generate summary analyses and reports of how users engage with content on their TVs and other devices; and (iii) help content publishers, broadcasters or content distribution services create or recommend entertainment that is more relevant to you, based on summary insights. The data is sometimes enhanced with household demographic data and data about digital actions (e.g. digital purchases and other consumer behaviour taken by devices associated with the IP address they collect).

To learn more about how Inscope uses your personal data, please consult their privacy policy at <https://www.vizio.com/privacy>.

3. How we use cookies

3.1 Advertising and Cookies

Besides functional cookies, which are used to enhance the operation of the Smart TV and the services, specific cookies are used on your Smart TV to show ads in and around content, including in apps. If you choose to accept “Relevant Advertising” in the Privacy Settings then you will receive cookie-based advertisements in your Smart TV environment, for example in the menu, before you begin to play a video or in an app.



The parties that use cookies are advertising platform providers and advertisers. Some platform providers and advertisers use cookies and Personal Data to track you across websites, services or devices, and show you interest-based ads based on that and other information. How advertising platform providers and advertisers use cookies and how they collect and use Personal Data is governed by their own privacy and/or cookie policies and we have no influence on this.

3.2 Third-Party cookies

In addition, we have identified a number of third-parties placing cookies on our Smart TVs in the context of showing ads or keeping track of the content you view in order to show you ads. This list is published on https://www.tpvision.com/policy/tpvision_cookie_list.pdf and will be updated frequently. These parties may separately place cookies and/or collect Personal Data, and they may do so to track you across websites, services or devices, and show you ads based on preferences.

3.3 Other / unforeseen cookies

As a result of how the internet and digital advertising works, it is not always possible for us to gain insight into the cookies that are placed by third parties via the advertisements on our system. This is particularly the case when these advertisements also contain embedded elements such as texts, documents, images or film clips that are stored by a third party.

Should you encounter cookies on your Smart TV that fall into this category and that we have not mentioned here above, please let us know. Alternatively please contact the relevant third party directly and ask which cookies they have placed, what the reason for this is, what the lifetime of the cookie is and how they have safeguarded your privacy.

3.4 Turn of cookies

You can turn off the use of advertising cookies in the Privacy Settings of your Smart TV within the setting “Relevant Advertising”. You will still see ads, but these will not be provided by any of the advertisement platform providers, or external advertisers. The advertisements you will still see will be provided to you by TPVision Europe B.V as part of the user interface.

3.5 Remove cookies

You can either reinstall your Smart TV using the “Reinstall Device” option or use the “Clear Internet Memory” function to remove all cookies on the device. The Clear Internet Memory function only deletes all cookies and log-in details, but does not unregister your Smart TV (so for instance all your preferences remain in tact).



4. Storing and processing your personal data

4.1 How long do we store Personal Data

We generally store Personal Data as long as it is needed for providing the services to you or for nine months, unless we said elsewhere in this policy that we store it for a shorter or longer period. We may store (aggregated) data longer if needed for tax or auditing reasons.

4.2 Information security

We have implemented appropriate technical and organizational measures to protect your Personal Data against accidental loss, alteration, unauthorized disclosure or access. The data that we collect is sent to our servers via an encrypted Internet connection and stored on a secure server. Access to this data is password protected and role based, i.e. limited to selected employees and those of our outsourcing partners who need to access it as part of their job description.

4.3 Sharing with others

We only share your Personal Data with third parties if either one of the following circumstances apply:

- If you consent to it: this is the case for example when you enable the content or recommendation services that we mentioned above. You can always withdraw your consent.
- In the context of outsourced activities: to enable us to provide you with the Smart TV Service we have contracted with certain affiliates of ours and outsource partners. These third parties are only allowed to process your Personal Data based on our instructions and in compliance with the agreements that we have executed with them.
- For legal reasons: we will also release Personal Data to the authorities, including law enforcement, if compelled by law.

4.4 Transfer of your Personal Data

You should also know that your Personal Data may be transferred from your home country to other companies that belong to the TPV Technology Group or to our service providers around the world. If you are an EU resident, this could imply that we also transfer data to countries that do not offer an adequate level of protection for your Personal Data. When we transfer this data, we will do so only when we have put in place appropriate contracts and safeguards to protect your Personal Data.

4.5 You are in control

If you don't want to:

- Share analytical data with us; or
- Don't want to use content recommendations and advertisements by Samba Tv



- Don't want us to use Relevant advertising data,

you can easily change this in the relevant setting in the Privacy Center on your Smart TV.

Is your Smart TV ID incorrect? You can easily change your personal information by logging out (data will be permanently deleted) and creating a new account.

Do you want to delete all Cookies and all data relating to the way you have used your Smart TV? You can either reinstall your Smart TV using the "Reinstall Device" option or use the "Clear Internet Memory" function. The Clear Internet Memory function only deletes all cookies and log-in details, but does not unregister your Smart TV.

Should you otherwise want to access your Personal Data, have it rectified, blocked or erased, or if you have any (other) questions on this Privacy document, you can always send us an email via privacy@tpv-tech.com and/or by mail by using the address provided for in paragraph 1.

5. Your rights

You have the right to request access to your Personal Data that we process. You also have the right to:

- Rectify incorrect Personal Data or erase it in certain circumstances.
- Restrict or object to the processing of your Personal Data.
- Right to erase and "Right to be forgotten".
- Receive your data so that you can use it elsewhere (data portability).

You also have the right to withdraw your consent at any time but we would like to point out that this does not affect the lawfulness of the processing before the date that you withdrew your consent. You can withdraw your consent by opting out in the Privacy Center. If you only want to delete all cookies and other local data relating to the way you have used your Smart TV you can reinstall your Smart TV using the "Reinstall Device" or "Clear Net TV Memory" option. You can also use the "Clear Internet Memory" or "Clear App Memory" function. Naming will vary per Smart TV model. The Clear Internet Memory function only deletes all cookies and log-in details, but does not unregister your Smart TV (so your device-ID remains valid).

Finally, you have the right to lodge a complaint with a Supervisory Authority. If you do not know who your supervisory authority is, please contact us and we will tell you. The Supervisory Authority in the Netherlands is: Autoriteit Persoonsgegevens, Bezuidenhoutseweg 30, 2594 AV, Den Haag, the Netherlands, Tel. 0900 - 2001 201.

6. If you are under 16

We do not knowingly collect data from children under the age of 16. If a parent or guardian becomes aware that his or her child or guard has provided us with information without their consent, he or she should contact us at privacy@tpv-tech.com. We will delete such information from our files within a reasonable time.



7. Version information

This policy was last updated on April 2018. It can be viewed on: <https://www.tpvision.com/legal-information/>.

Key terms

Advertiser: This is a third party - including advertising agencies - that can buy ad space to show advertisements on the Smart TV. Depending on the context, an advertiser can buy the ad space directly from us or through an intermediary such as an advertising platform provider.

ACR feature: an identification technology to recognize content played on a media device or present in a media file. Devices containing ACR support enable users to quickly obtain additional information about the content they have just experienced without any user-based input or search efforts. For example, developers of the application can then provide personalized complementary content to viewers

Ad space: Means the display space and/or time slots which are used to show advertisement on the Smart TV.

Advertising platform provider: The companies that we, our content partners and advertisers use to sell and buy ad space.

App: Means a website or application owned, developed, hosted, operated and maintained by a content partner. We have no control over the app or over the Personal Data that the content partner or other companies collect through your use of the app.

Content partner: Means the party that owns, develops, hosts, operates and maintains an app.

Cookie: A cookie is a small file containing a string of text that is sent from a server that you visited on the internet to your device and that can be read again by this server at a later time.

Consumer-ID: For each Device that is authenticated on a Smart TV, that Smart TV will generate and store a unique number to enable it to distinguish between different Smart TV owners. This is the Consumer-ID. The Consumer-ID may be linked to Personal Data provided by you during registration at your Smart TV. If you do not register, the Consumer-ID is anonymous.

Device: means any Internet connected product, which is capable to access the Portal and has been certified by us.

Device-ID: The first time you connect your Smart TV to the internet, we generate a device-ID and tie it to your Smart TV. With this device-ID we can authenticate and identify your Smart TV to connect to our Smart TV services. Some content partners also need to authenticate your Smart TV. For this reason we provide your device-ID to those content partners, who can then recognize your Smart TV. Not every content partner can see your device-ID, this is limited by us. If you use part of the functionality of the Smart TV service with our app, we will also assign a device-ID to such mobile device.

Device Portal: a Device authentication server, used to authenticate and identify Devices.



IDFA: an identifier for advertisers, which identifies your device so that advertisers can track you and send you advertisements.

IP-Address: Every device that is connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP-address can often be used to identify the location from which a device is connecting to the Internet.

IP-EPG: means the Electronic Program Guide provided by us, which is accessible by pushing the "Guide" button on the remote control of the Device, or by means of the menu on the Device.

Mac-Address: a unique identifier assigned to network interface controllers for communications at the data link layer of a network segment. MAC addresses are used as a network address for most IEEE 802 network technologies, including Ethernet and Wi-Fi.

Mobile Device: means a smartphone, tablet computer or other mobile Internet connected product.

Personal Data: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (art. 4(1) GDPR).

Privacy center: the privacy center is a menu available on your TV in which you can make changes to your privacy settings. You can access the Privacy center by accessing the App Gallery on your Smart TV and then press the OPTIONS key on your TV remote control.

Serial Number: a number indicating place in a series and used as a means of identification

Smart TV ID: Unique identifier that links your Twitter™ or Dropbox™ account to a social media application

Supervisory Authority: as TP Vision main establishment is located in the Netherlands, and the Supervising Authority is Autoriteit Persoonsgegevens, <https://autoriteitpersoonsgegevens.nl/nl>, tel. +31(0)900 - 2001 201

URL: means uniform resource locator. This is the web address of a site, which is inserted in the navigation bar of the browser of your Device.

Viewing data menu: a menu only available on your TV in case the ACR feature is available for your country. In this menu you can at any time change your consent for using the ACR feature.

You: means the natural person whose Personal Data is collected and processed by us.