

Device Privacy Policy

TP Vision and TitanOS

TITAN OPERATING SYSTEM, SL ("Titan") and TP VISION EUROPE B.V. ("TP Vision") (jointly "we", "us" and "our") are committed to protecting your privacy and handling your personal information responsibly. This Privacy Notice provides you with information of how Titan and TP Vision handle your personal information. Titan and TP Vision are independent Data Controllers for the personal information we collect and process, which means we make independent decisions about the information we collect from you. In this Privacy Notice we will make a distinction between Titan and TP Vision where applicable. When we collect and use your information, we comply with data privacy laws and implement technical measures to protect your personal information from unauthorised use and access.

1. What types of information do we collect?

Titan

- **Portal information:** information from and about the Portal(s) you use to access our services, including:
 - hardware and software information such as IP address, Portal ID (and other identifiers used to uniquely identify the Portal) and type, Portal-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google's AAID and Apple's IDFA, both of which are randomly generated numbers that you can reset by going into your Portal' settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your Portal or browser (e.g., MAC address, Device id); and
 - information on your wireless network connection, like your service provider and signal strength.
- **Usage Information:** information about your activity on our services, for instance how you use them (e.g., date and time you logged in, features you've been using, searches, clicks and content which have been shown to you and advertising that you click on). Where Titan relies on our legitimate interests to collect usage information (for example, for click counting purposes) Titan will use randomised hashing which ensures

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Okay

or your device.

Titan may collect this information directly from your Portal, or it may be shared by one of our partners, including the Original Electronic Manufacturer (OEM) of the Portal, e.g. TP Vision.

TP Vision

- **Smart TV operation and maintenance:** the 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.
- **Statistics to help us improve:** analytics data like "app click behaviour", "channel zap behaviour" and other interaction that you may have with your Smart TV. 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.

TP Vision may collect this information directly from your Portal, or it may be shared by one of our partners, including Titan. For more information on TP Vision's privacy practices, please read the Smart TV Privacy Statement at <https://www.tpvision.com/legal-information/>.

2. What do we use your information for?

Titan

Titan processes your personal information for the following purposes:

- To provide the Titan services:
 - To personalise recommendations across streaming platforms and broadcasters to you.
 - To provide personalised advertising (also known as Interest Based Advertising).
 - Identify Portals based on information transmitted automatically
 - Match and combine data from other data sources
 - Link different Portals
- To allow you to connect your Smart TV to Apps and social media
- To contact you if needed to resolve issues, communicate about the services and deal with any complaints or questions from you.
- To improve the Titan services:
 - Conduct research and analysis of users' behaviour to improve our services and content (for instance, Titan may decide to change the look and feel or even

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on users' behaviour); and
for example, Titan may decide to build a new
received from users);

- Ensure security, prevent and detect fraud, and fix errors.

We process your personal information based on the following legal bases:

- Providing the Titan services – Consent, performance of contract or Legitimate Interest, as applicable
- Allowing connection to Apps and social Media - Consent
- Contacting you about the services or other issues – Performance of a contract
- To improve the Titan services – Legitimate interest
- To develop new features and services – Legitimate interest
- Optional features offered by third parties - Consent

TP Vision

TP Vision processes your personal information for the following purposes:

- Providing Smart TV operation and maintenance:
 - TP Vision uses 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.
- Statistics to help us improve:
 - TP Vision uses this information for the purpose of problem solving and to use experiences for future improvements of our products.

We process your personal information based on the following legal bases:

- Providing Smart TV operation and maintenance –legitimate interest
- Statistics to help us improve – legitimate interest

3. Who do we share your information with and why?

We may share your personal information with third parties:

- **Technology Partners:** TP Vision is the manufacturer of your Smart TV and uses the aforementioned data collected through your Smart TV for the purposes detailed above.
- **TV Software Partners:** Titan is the developer of the Portal and uses the aforementioned

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purposes detailed above.
as on our behalf;

- **Technical Partners:** To support our provision of services and ensure their reliability and improvement. These include technical partners that are used to provide ad-supported free channels (FAST), such as Server-side Ad-insertion (SSAI) companies, as well as partners who are used to provision the advertising content, such as ad-serving companies.
- **Content Partners:** Companies that provide content in audio, visual or other forms, as well as supporting us in the curation of content so as to personalise this to your potential interests.
- **ACR providers:** Your Smart TV may contain the ACR Feature, which is switched off as a standard setting when you first install the Portal. If this feature is enabled, "Samba TV" (Free Stream Media Corp., 301 Brannan St, San Francisco, CA 94107, USA, www.samba.tv) will collect data related to publicly available content displayed on your Portal, 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 Portal, 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 Portal at any time. Turning it off will not affect the performance of your Smart TV or any other online. Samba TV processes viewing data as set out in the Samba TV privacy policy. Please consult their privacy policy at <https://samba.tv/legal/privacy-policy/>.
- **Advertisers/Ad Measurement Companies:** We may share information collected from or about you with Advertisers and/or Ad Measurement Companies to select advertisements, and measure and improve advertising effectiveness;
- **Others:** We may disclose and otherwise use your personal and other information where we or they reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities (including payment fraud), security or technical issues, or (d) protect against harm to our rights, property or safety, its users or the public, as required or permitted by law; and
- **Business transfers:** In connection with any reorganisation, restructuring, merger or sale, or other transfer of assets, we will transfer information, including personal information, provided that the receiving party agrees to respect your personal information in a manner that is consistent with our Privacy Notice.

Some of these third parties may be located outside of your country. Whenever we send

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we will ensure that the information is secure and as permitted by the applicable

privacy laws. We have safeguards in place to protect your personal information and you may contact us for copies of such safeguards.

4. How do we share your data?

As part of Titan's Data Privacy Notice, Titan operates a Data Minimisation policy, which ensures that only the data that is reasonably required to perform the service will be shared with third parties.

Your data can be anonymised and shared in a secure manner with third parties. The anonymisation of your data ensures that this information cannot be used to identify an individual. Wherever possible, Titan will share your personal data with third parties via Data Clean Rooms, which ensure that your data does not leave our data environment and cannot be viewed or accessed at an identifiable level by the third party.

5. How long do we keep your information?

We generally store Personal Data as long as it is needed for providing the services to you or for three years unless we said elsewhere in this notice that we store it for a shorter or longer period. We may store (aggregated) data longer if needed for tax or auditing reasons, as required by the applicable local laws.

6. Will my data be sent out of my country (International Transfer of your Personal Data)?

You should also know that your personal information may be transferred from your home country to our service providers around the world. If you are a UK/EU resident, this could imply that we also transfer data to countries that do not offer an adequate level of protection for your personal information. When we transfer this data, we will do so only when we have put in place appropriate safeguards and where necessary contracts to protect your personal information.

7. Changed your mind?

You may have certain rights regarding your personal information under the applicable privacy laws, including: the right to access your personal information held by us; rectify your personal information, in other words to correct any information that we've got wrong; erase personal information we no longer need or shouldn't have; restrict processing of your personal information; object to its processing and require data

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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 Preference Centre. 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 Portal" 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 Portal-ID remains valid).

If you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to your local data protection regulator. Titan is regulated by the Spanish Data Protection Authority, their address is C/ Jorge Juan, 6. 28001 – Madrid, Tel. 900 293 183.

TP Vision is regulated by the Dutch Data Protection Authority: Autoriteit Persoonsgegevens, their address is Hoge Nieuwstraat 8, 2514 EL The Hague, the Netherlands, Tel. (+31) – (0)88 – 1805 250.

8. How we use cookies and advertising identifiers

We use technology in the Portal to obtain certain information about your Smart TV and how you interact with the Portal, such as user settings, browsing history and activities conducted while using the Portal ("Cookies").

Advertising

If you choose to accept 'personalised advertising and content' in the Privacy Preference Centre then you will receive personalised advertisements in your Smart TV environment, for example in the menu, before you begin to play a video or in an app, or in the video itself.

Identifier for Advertising (IFA)

The IFA ID is the identifier that is used to personalise advertising to you. This identifier can be reset at any time, by accessing the Data Privacy Settings on the Portal. By resetting this identifier, all previous information relating to your use of the Portal, which was attached to the original identifier, will be forgotten.

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By selecting this option in the Data Privacy Preference Centre, you are consenting to the use of an IFA ID means that this identifier will not be reset.

used to personalise advertising by advertising platform providers and advertisers. Please note that the IFA ID will still be generated.

The parties that utilise these are advertising platform providers and advertisers. Some platform providers and advertisers use this identifier and other Personal Data to track you across websites, services or Portals, and show you interest-based ads based on that and other information. How advertising platform providers and advertisers use these identifiers 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.

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, keeping track of the content you view in order to show you ads and to store login information for 3rd party applications, such as login credentials.

This list is published at

https://www.tpvision.com/policy/Smart_TV_Third_party_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 Portals, and show you ads based on preferences.

Links to third party content

Please note that some advertisements may contain embedded elements such as texts, documents, images or film clips that are stored by a third party. Please check the advertiser's privacy policy for further information.

Turn off ad-tracking

You can turn off the use of advertising tracking in the Privacy Settings of your Smart TV within the settings: 'Privacy settings' / 'Privacy Preference Centre'. 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 Titan as part of the user interface.

Remove cookies

We use cookies to personalize content, run ads, and analyze traffic.

"Reinstall Portal" option or use the "Clear

Memory" function to remove all cookies on the Portal. 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 intact).

9. Changes to this notice

We may update this notice to reflect changes in our practices. The updated version will be communicated to you via the Portal interface, as well as being available in the Data Privacy section of the Portal settings.

10. Any questions?

For any questions regarding Titan please contact Titan directly at: legal@titanos.tv.

For any questions regarding TP Vision please contact TP Vision directly at: privacy@tpv-tech.com.

Last update: January 2024.

Products	Legal	Development	Company	Conn
Operating System	Privacy policy	Partner portal	About	Get in
Advertising	Device privacy policy	Documentation	Jobs	News
Channels	Global device privacy policy	Security	Newsroom	Link
	Legal notice	Available apps		
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