

Roku Privacy Policy

Roku respects and values the privacy of our users. This Privacy Policy describes the information that Roku, Inc. and our affiliated companies other than Frndly TV, Inc., TOH Intermediate Holdings, LLC and the subsidiaries of Frndly TV, Inc. and TOH Intermediate Holdings, LLC (**“Roku”, “we”, or “us”**) collect about consumers (**“you”** and **“your household”**) and how we use and disclose that information.

Scope of this Privacy Policy

This Privacy Policy applies to information collected by Roku through the **“Roku Services”**, which includes: Roku's websites (**“Roku Sites”**), Roku's products and certain other products utilizing Roku's streaming platform or operating systems (including Roku players, Roku TV models, Roku Smart Home devices, speakers and other audio-enabled products) (collectively, **“Roku Devices”**), Roku's mobile apps (including the Roku Mobile App and Roku Smart Home App), Roku branded services like the Roku Media Player, The Roku Channel and Roku Sports Channel, including when you access them from third-party platforms and services (**“Roku's Channels”**), Roku's advertising services, Roku emails and newsletters, and Roku's accounts on third-party social networking sites.

Using our products and services, you can access apps provided by other companies (**“Third-Party Channels”**), including hybrid broadcast broadband (**“hbbtv”**) channels that may be available in your region. When you install, access or stream one of these apps, you are also interacting with that app directly, and the app provider and its analytics and advertising partners may collect information from your Roku Device, including your device identifier and how you use their services. In addition, Roku's Channels may also be available on platforms operated by other companies, including smart TVs, set top boxes, streaming devices, gaming devices, mobile devices, websites or other internet connected devices. This Privacy Policy does not cover the actions and privacy practices of these app providers, platform operators or their partners. For more information about how these companies use your data, please see their privacy policies.

Part I. Information Collection

Information is collected from or about you from various sources, as described below.

A. Information You Provide

1. Registration Information

When you sign up for a Roku account, we ask for information such as your name, email address, postal address, telephone number, birth date, tax ID (for users in certain countries), gender and other demographic information. We also may collect similar contact information if you register to use or receive other products or services offered through Roku, such as when you register to receive copies of blog posts.

When you subscribe to a streaming service from another provider through the Roku Services (e.g., when you subscribe to a streaming service on Roku Sites or within The Roku Channel, or to a Third-Party Channel on a Roku Device), your Roku account registration information may need to be collected by the provider to create an account with that service. For more information about how these providers will use your data, please see their respective privacy policies.

2. Purchase, Payment and Shipping Information

When you add a credit card or payment method to your account or place an order with us, we will also collect your payment information and billing address, and if you make a product purchase, other information that may be needed to complete your purchase, such as your shipping address, tax ID or other verification information.

We connect you with merchants who partner with us to offer goods and services for sale on the Roku Services, through features such as shoppable ads. If you interact with a shoppable ad or if you choose to make a purchase on the Roku Services from these participating merchants, they and their partners will also collect information about you or information you provide, including your name, billing address, shipping address, email address, phone number, and payment information, to process the transaction, fulfill and ship your order, and for other purposes. You should review the privacy policies of the companies with whom you choose to transact with to understand how your data will be used by them. Roku will also collect your purchase information.

3. Other Contact Information

If you use product features with text messaging or email, Roku will also collect the phone number, email address, and any other contact information you provide to communicate with you in accordance with your account preferences and device or service settings. You may modify your Roku communication preferences and settings at any time by updating this information in your Roku account, in the relevant Roku mobile app, or certain device settings. Please consult the relevant online support documentation [here](#) for more information.

4. Communications

If you contact us directly, we will receive additional information you provide, such as your name, email address and phone number, and the contents of any message or attachments that you send to us. You may also provide us with information if you subscribe to marketing communications from us or to obtain content such as product information, whitepapers and reports. If you message other users on the Roku Services like Roku Community, we will receive the contents of those messages.

5. Information You Provide About Others

We also collect the personal information of other people. For example, if you invite or refer our products or services to families and friends by providing their names or email addresses, or if you provide the postal addresses and other contact information of recipients for gift purchases. Personal information about other people may be collected and used when you use Roku Smart Home devices and services. For instance, your Smart Home Devices may capture videos, images or voice content of other individuals.

We rely on you to obtain any required permissions in advance to allow us to collect their personal information.

6. Uploaded Files

Roku collects and may review (for example, for content moderation purposes) any files, including photos, videos or audio files, that you choose to upload or make accessible to the Roku Services.

7. Comments, Reviews and Feedback

You can provide comments, reviews and feedback on Roku Sites (e.g., Roku's developer forums, blogs, message boards, community pages), and accounts on third-party social networking sites. Information posted in these venues may be available to the public. Please be mindful of your own privacy needs and those of others as you choose what to disclose and make public. We cannot control the privacy or security of information you choose to make public.

B. Information Collected Automatically Through the Roku Services

1. Device Information

We may receive information about the browsers and devices you use to access the Internet, including our services, such as device types and models, unique identifiers including advertising identifiers (e.g., for Roku Devices, the Advertising Identifier associated with that device), MAC address, IP address, operating system type and version, browser type and language, Wi-Fi network name and connection data, and information about other devices connected to the same network. We may also gather the WiFi MAC addresses, country code, and broadcast signal strengths of your router and other Wi-Fi

routers in your area. For Roku Devices, we may also collect the name of the retailer to whom your Roku Device was shipped, various quality measures, error logs, software version numbers, and device status (including the status of battery-powered accessories). When you enable Bluetooth while using Roku Services, we may collect your Bluetooth usage, such as connection quality, the name of the device connected to your Roku Device, and the start and stop time of your connection.

We may infer your general location information and internet service provider from the device information we collect (for example, IP address and MAC address may be used to infer your geographic area). You may also choose to provide your location to enhance the functionality of your Smart Home Devices.

2. Information from Cookies and Similar Technologies

We and our business partners, such as analytics and advertising partners, collect information about your online activities over time and across different online services. For example, we use cookies, pixel tags, web beacons, SDK, device identifiers or similar technologies to recognize you when you use Roku Services, and to collect information such as the number of visits, which features and pages are popular, and to measure your browsing activities. These technologies allow us to optimize the operation of our services, including by allowing us to ensure our services are functioning properly, improve and personalize the services, and to provide, personalize, and measure advertisements.

Similarly, we and our third-party service providers use e-mail tracking technologies to monitor the success of e-mail campaigns (for example, to track whether an email was opened and record how many e-mails in a campaign were opened).

3. Activity, Location, Viewing and Usage Information on Roku Services

We receive information about your interactions with the Roku Services, such as your browsing history, search history, search results, audio information when you use voice-enabled features, interactions with content and ads, interactions with other features of our platform, and settings and preferences. When you access streaming services on a Roku device or Roku's Channels on other devices, we may collect information about your activities, like the apps you install or access (including usage statistics such as what apps you access, the time you access them, and how long you interact with them), and information about the videos and other content you select and stream within these streaming services.

When you use a device with our operating system with the Smart TV Experience, you have the option to enable Automatic Content Recognition ("**ACR**") technology to collect information about what you watch or access (e.g., the programs, video games, ads and channels you viewed or accessed, and the date, time and duration of the viewing or access) via your TV's antenna, cable box, game console, media player or other connected devices, and we may also collect additional information about the videos and other content you stream. The data collected while the Smart TV Experience is enabled may vary depending on your particular device and when you enabled the Smart TV Experience. For information specific to your device, please see the *Privacy > Smart TV Experience* section of your device's settings menu. If you disable this setting, Roku will not use ACR on your devices, but Roku still receives information about your interactions and streaming activities on your devices through other methods. For example, Roku will still collect information about your viewing or interactions with third-party streaming apps, The Roku Channel, the Streaming Store, the Roku Home screen, and ads enabled by Roku (including ads appearing in third-party streaming apps on your devices), as well as information that third-party streaming app providers may provide to Roku.

If you use the Roku Media Player to view your video or photo files or listen to your music files, Roku will collect data about the files viewed within the Roku Media Player, such as codecs, and other metadata of the local files you play through the Roku Media Player.

If you use Roku's mobile app as a remote control or to otherwise interact with another device, we will collect the device identifier of the device with which the mobile app interacts.

Roku's Advertising Services

Through Roku's advertising services, we receive information about when, where and how an ad was displayed, and other contextual information about when the ad was served, and your clicks and any other information you provide when you interact with the ad (such as your phone number in order to receive a coupon code, your zip code to find an advertiser's closest locations or information related to the purchases you make through our shoppable ads). For example, when Roku provides advertising services in Third-Party Channels, Roku receives information related to the ad.

When you visit websites, apps, streaming services, and connected devices (including Smart TVs and mobile devices) to which Roku provides advertising or measurement and analytics services, we may receive information about your activities, including information related to content you view, the date and time of your visits, how you interact with these websites, apps and devices, and how you interact and respond to ads. If our advertising partners choose to disclose this information to us, we will also receive other information connected to your interactions with these ads or advertisers, such as your name, email address, phone number, postal address, IP address, user agent and other online identifiers (such as any subscription ID or advertising IDs) that the advertiser has associated with you. For more information about how these advertisers use your data, please review their privacy policies.

4. Information We Receive from Third Parties

We collect information about you from other sources for the purposes described in Part II of this Privacy Policy, including to provide you a tailored user experience and advertising that may be of interest to you. For example, we may collect information from the following sources:

- **Third parties who distribute Roku's Channels on their devices and services.** For example, if you access Roku's Channels on media streaming devices, mobile devices, or websites from other companies, they may provide us IP addresses, device IDs or other unique identifiers, and user actions that relate to Roku.
- **Third parties whose services are available through the Roku Services.** For example, Third Party Channels may provide us IP addresses, device IDs or other unique identifiers, account status, services. If you add a third-party payment service to your Roku account, we will receive payment and billing information about you (e.g., your payment method) from that service.
- **Linked Account Providers.** If you link a third-party account (such as Alexa, Google Home, or Google Photos) to your Roku account, Roku will receive data from that provider such as voice command transcriptions (in the case of voice assistant accounts), and photo album metadata (in the case of photo storage accounts).
- **Data providers, ad networks and other advertising partners.** These business partners may provide IP addresses, device IDs, other unique identifiers, and information about you, such as information about your online activities, interests, household information, demographics, health, and wellness.
- **Advertisers.** Advertisers that show ads through Roku's advertising services may also provide data about individuals to us to personalize and measure ads through Roku's advertising services, and for other purposes described in Part II.
- **Service providers.** We outsource some of our operations to our service providers and vendors. For example, payment service providers that provide us payment or balance information, and ad fraud vendors that provide IP addresses to help us identify potentially suspicious activities.
- **Sweepstakes and Contests.** If you enter one of our sweepstakes or contests hosted on a third-party platform, we will receive information about you and the information you provide to enter.

We may also receive your personal information from other individuals if they have referred you as described under Part I, Section A(5), above.

5. Information Collected by Streaming Service Providers

If you install, access or use a streaming service through us (such as a Third-Party Channel or third-party streaming service within The Roku Channel), or if you conduct a voice search in one of these

services, or when you access these apps through any available hbbtv features on your Roku TV model's remote, you may also be interacting with that provider directly, and the provider and its advertising partners may collect information about your Roku Devices (including unique identifiers, IP addresses, and device settings like language and time zone) and your usage of their service (e.g., videos, ads and other content you search, select and stream within their service, and audio information when you use some of the voice-enabled features). These streaming services may collect some of the information described in this section when their app is installed but not actively streaming.

These streaming services may also receive your Roku account registration information (if you choose to subscribe to their service), and information about your interactions with the Roku Services, as further described in Part III, B below. You should review the privacy policy for the streaming service you want to install or stream to understand how your data is used by that provider.

6. Information Collected by Providers of Linked Accounts

If you link your Roku Device or Roku account to a non-Roku service (e.g., Google Photos, Alexa and Google Assistant), you are choosing to have the provider of that service collect information about you and your Roku Device, which may include device type and name, device identifiers, its state (e.g., whether the device is powered on, whether the device is playing video), names of installed streaming service apps, and the names of your device HDMI ports. If you direct a virtual assistant to display content (such as the feed of your Roku home security camera), you are authorizing Roku to provide that information to the virtual assistant provider to carry out your request. For information about how these providers use this data, please review their privacy policies.

7. Information Collected by Third-Party Platforms, Websites, and Devices You Use to Access the Roku Services

If you access our services, such as Roku's Channels, on platforms, online services, and devices operated by other companies, including third-party smart TVs, streaming devices, mobile phones, or websites, these companies may also collect information about you. You should review the privacy policy for these companies to understand how your data is used by them and their partners.

Part II. Information Usage

We may combine the information we collect about you and use it to derive other information and inferences about you. We use the information we collect and derive for the following purposes:

- **Support, Maintenance and Fulfillment.** We use your information to provide and maintain the Roku Services, and to process and fulfill your requests or orders;
- **Improvement of Products and Services.** We use your information to understand and analyze our user base and how you use the Roku Services, to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionalities;
- **Personalization.** We use your information to personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations;
- **Advertising Services.** We use your information to show you ads (including personalized ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to create online identifiers, measure and understand the reach, viewership, and effectiveness of advertising, and to provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns. We associate the browsers and devices (such as smartphones, tablets, streaming players, connected TVs, and computers) used by the same individual or household for purposes of advertising to that individual or household on different browsers or devices. This allows, for example, ads you see on your tablet to be based on activities you engaged in on your Roku TV.

- **Marketing and Promotions.** We use your information for marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing;
- **Analytics and Performance.** We use your information to measure performance and analyze key metrics relevant to our business;
- **Service Communication and Customer Care.** We use your information to communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service;
- **Protect Roku, our Users and Others.** We use your information to enforce our terms and conditions or protect our business, partners or users, and to comply with our contractual and legal obligations; and
- **Security and Fraud Prevention.** We use your information to protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

Part III. Our Disclosure of Information

A. Service Providers and Vendors

We work with other businesses (including contractors and service providers) to provide services for us and to help with our operations, which may require that they access and use your information. For instance, we may use other companies to communicate with you (including via telephone, email, or letter) about our products or services, to send information to you, to process and collect payment via your credit card (if applicable), to provide customer support and other services (including any chat feature managed by our service providers, who will receive your communications through the chat feature), to obtain additional data about you, and to perform analytics and other work that we may need to outsource -- such as using Google Analytics to collect and process certain analytics data for Roku Services. These analytics services may also collect information regarding your use of other companies' websites, apps, online services, and devices. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

B. App, Content and Feature Providers

We may disclose personal information with partners whose services are available through the Roku Services such as providers of Third-Party Channels, media content, or other services on the Roku Services. This information may include Roku account registration information, and information about your interactions with these providers, their services and the Roku Services, and it is disclosed for different purposes, including for reporting and analytics, helping you subscribe to apps or access paid content, providing services to you, tailoring your user experience, customizing your searches and discovery, and personalizing ads to you.

C. Advertisers, Ad networks and Other Advertising Partners

We work with ad networks and other advertising partners to show you ads that we think may interest you for Roku's products and services on Roku Services and on other companies' websites, apps, and devices. We also work with them to show you ads from advertisers on Roku Services and on other companies' websites, apps, and devices. We disclose information to these ad networks, advertising partners and our advertisers, and they may set and access their own cookies, pixel tags and similar technologies on the Roku Services and they may otherwise collect or have access to information about you which they collect over time and across different online services and devices.

D. Advertising Measurement Providers and Services

We work with advertising measurement providers and their service providers to help us, advertisers and others understand information about the content and ads viewed, and the effectiveness of ad campaigns, including the audience that saw their ads and how they responded. We may also disclose your demographics data and audience segments (e.g., sports fans, sitcom enthusiasts, cord cutters, etc.) with advertising measurement providers and their service providers.

Roku, through its advertising services, provides measurement and analytics solutions to other companies. In providing these services, we analyze and reorganize ad campaign data from these companies and provide analytics reports to help them better understand the audience that viewed the company's ads and whether those viewers belong to the same household.

E. Third-Party Platforms and Devices You Use

If you access our services, such as Roku's Channels, on media streaming devices, websites, or mobile devices from other companies, we may disclose certain information to them, including information about your interactions with Roku's Channels and their content, IP address, device identifier, and user privacy settings to coordinate on the provision of services to you, tailor your user experience, and personalize ads to you.

F. Participating Merchants

If you buy goods or services on the Roku Services, we may need to disclose information about you and information you provide to the merchant to process the transaction, fulfill and ship your order, and for other purposes.

G. Corporate Affiliates

We may disclose your information to our current or future affiliates (which means a parent company, and any subsidiaries, joint ventures, or other companies under common control), in which case we will require our affiliates to honor this Privacy Policy.

H. Consent

We may also disclose personal information, including personally identifying information, with your consent. For example, when you agree to our disclosure of information about your requests for and viewing of specific movies, programs, games, and video services to third parties to personalize ads or to improve their products by enabling the 'Content Viewing Disclosure' setting, or when you agree to our provision of your personally identifying information to other third parties for their own marketing purposes, subject to their separate privacy policies.

I. Merger, Sale, or Other Asset Transfers

We may also disclose your information to others in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company.

J. As Required by Law and Similar Disclosures

We may also disclose your information (1) to comply with laws or to respond to lawful requests and legal process, (2) to protect the rights and property of Roku, our employees, agents, customers, and others, including to enforce our agreements, policies, and terms of use, (3) in an emergency to protect the personal safety of Roku, its employees or customers, or any person, or (4) to investigate, prevent, or take action regarding illegal or suspected illegal activities.

K. Aggregated or De-Identified Information

We may also disclose aggregated or de-identified information (i.e., information that does not personally identify you directly), or statistical information about you, including demographics data and audience segments (e.g., sports fans, sitcom enthusiasts, cord cutters, etc.), to others for a variety of purposes, including for their own uses, for example, for improving their products and services for us and others, and to make ads more relevant to your interests.

L. Other Users of the Roku Services

We may disclose your information to other users of the Roku Services at your request, or when you use certain features of our products and services. For instance, if you post comments or publish a review of a Roku product on the Roku Sites, other users of the Roku Sites will be able to read your review. If you upload content for access by others, including comments, videos or audio files, to the Roku Services, or if you grant access to your Roku Devices, these content and devices will be viewable by other users. If you direct message another user through the Roku Services, then we will disclose your message and your user ID to that user.

Part IV. Children's Privacy Notice

This notice is provided pursuant to the Children's Online Privacy Protection Act (COPPA).

Roku implements special privacy protections in certain parts of the Roku Services, such as the Kids & Family section in The Roku Channel, and the Kids section of the Roku Channel Store. When any user interacts with these parts of the Roku Services, Roku collects the following personal information: any voice commands that a user chooses to submit, persistent identifiers, and usage information about the interactions with those parts of the Roku Services.

Roku uses these voice commands to effectuate their instructions or requests, and the voice recordings that Roku collects are immediately deleted thereafter. Roku uses these persistent identifiers and usage information for the following internal operations:

- Maintaining or analyzing the functioning of the Roku Services;
- Performing network communications;
- Authenticating users of, or personalizing the content on, the Roku Services;
- Serving contextual advertising on the Roku Services or capping the frequency of advertising;
- Protecting the security or integrity of the user or the Roku Services; and
- Ensuring legal or regulatory compliance.

Roku prevents these persistent identifiers and usage information from being used or disclosed for other purposes that do not constitute internal operations (such as behavioral advertising) through internal policies and logic-based restrictions in its internal systems. For example, Roku's behavioral advertising systems are configured to exclude personal information collected from those parts of the Roku Services described above. Roku retains these persistent identifiers and usage information for as long as needed to fulfill the internal operations purposes for which the data was collected unless we are required by law to retain it for a longer period.

The disclosure in this notice does not apply to the practices of any third-party services (including Third-Party Channels) that may be accessed through the Roku Services. Before using any third-party service, you should review the applicable terms and policies to determine their appropriateness for your child, including the service's data collection and use practices.

If you have any questions about our processing of personal information described in this Children's Privacy Notice, you can contact Roku at:

Attention: Legal Department

Roku, Inc.

1173 Coleman Avenue

San Jose, CA 95110

privacy@roku.com

Part V. Information Access and Choices

A. General Requests

If you have a Roku account, you may view and update certain contact and billing information we have about you by logging into your account on [Roku.com](https://roku.com). If you otherwise wish to ask for access, correction, or deletion of any of your personal information held by us, please click [here](#). However, we may decline requests that are unreasonable, prohibited by law, or are not required to be honored by applicable law.

B. Email Marketing Choices

Our marketing emails tell you how to opt out of receiving further marketing emails. If you opt out, we may still send you non-marketing emails, such as emails about your accounts and our business dealings with you, and, as allowed by applicable law, requests for your participation in surveys. You may also opt out of receiving marketing emails from us by unchecking the box [here](#).

C. Personalized Advertising Choices

If you are logged in to your Roku account, you can manage your preference for personalized ads from Roku by adjusting the “Personalized Ads” setting in your account. You can access this setting in the Privacy section of the Settings menu of your Roku players and Roku TV models, or on our website [here](#). When you disable this setting, we will not personalize your ads while you are accessing our services using your Roku account. You will still see ads, but they will be less relevant to you. Ads you see can still be “contextual” – for example, they can be based on the subject matter of what you are viewing or the time of day. If you are streaming a Third-Party Channel on a Roku player or Roku TV model, that app may not respond to this setting. It may offer its own settings to address ad personalization and you should review the privacy policy provided by the Third-Party Channel to understand your choices. You can also reset the Advertising Identifier of your Roku player or Roku TV model by choosing “Reset Advertising Identifier” in the device settings.

If you use Roku’s services without logging into your Roku account, or if you access other apps or devices where Roku provides advertising services, you can exercise your choices below. Each of these opt-out mechanisms below opts you out of Roku’s personalizing of ads only for that specific device or app and will not affect activities or personalized advertising on other apps or different devices.

- on mobile apps by using any limit ad tracking settings offered by your mobile operating system; and
- on Smart TVs, set top boxes, media streaming devices and other OTT platforms from other companies by using any limit ad tracking (or similar) settings offered by that platform, if one is available.

You can opt out of personalized ads from third parties on the Roku Sites through Roku’s cookie consent tool [here](#). This tool opts you out of personalized advertising only for the specific browser from which you opt out and will not affect activities or targeted advertising on other browsers or different devices.

Do Not Track: Some Internet browsers include the ability to transmit “Do Not Track” signals. Since uniform standards for “Do Not Track” signals have not been adopted, the Roku Sites do not currently process or respond to “Do Not Track” signals. To learn more about “Do Not Track”, please visit [“All About Do Not Track”](#).

D. Choices Regarding “Smart TV Experience”

i. Automatic Content Recognition (ACR):

If you have enabled Roku’s ACR setting, you can withdraw your consent by going to Settings on your Roku device (*Settings > Privacy > Smart TV Experience*) and de-selecting “Automatic Content

Recognition (ACR)".

ii. Content Viewing Disclosure:

If you have enabled Roku's Content Viewing Disclosure setting, you can withdraw your consent by going to Settings on your Roku device (*Settings > Privacy > Smart TV Experience*) and de-selecting "Content Viewing Disclosure". If you wish to withdraw your consent to the disclosure of particular titles, email Roku at ContentViewingDisclosureOptOut@roku.com.

E. Voice Feature Choices

Visit the Settings menu of your Roku Device with voice-activated features (under *Settings > Privacy > Voice*) for controls regarding apps' access to the microphone on your remote control or mobile device. You can also disable Roku's retention of voice recordings captured on your remote control or mobile device by logging into your account on Roku.com and visiting the Voice Settings page. For Roku remotes with a hands-free voice feature, you can disable that feature. Please refer to the product information accompanying these remotes or our support website for further instructions.

F. Smart Home Device Data

If you own a Roku Smart Home device, you can manage device settings and the retention and transfer of device content from the Roku Smart Home Mobile App and/or the Roku Smart Home webpage. You may be asked to provide video and audio recordings to help Roku and its partners improve their products and services but are not required to provide consent.

G. Choices Regarding Cookies on the Roku Sites

You may manage or opt-out of many non-essential cookies served through this Roku Site by using the [Cookie Consent Tool](#) provided. Your choices will apply only to the specific browser and device from which you opt out and will not affect activities or targeted advertising on other browsers or different devices, including Roku Devices and your mobile devices. Please note also that if you choose to reject or remove cookies, this may prevent certain features or services of Roku Sites from working properly. Since your cookie opt-out preferences are also stored in a cookie in your website browser, please also note that if you delete all cookies, use a different browser, or buy a new computer, you will need to renew your opt-out choices.

Part VI: Data Storage, Transfers and Security

A. Security: We use industry-standard methods of securing electronic databases of personal information. However, you should know that no company, including Roku, can fully eliminate security risks associated with personal information. To help protect yourself, please use a strong password, do not use the same password to access your Roku account that you use with other accounts or services, and protect your usernames and passwords to help prevent others from accessing your accounts and services.

B. Transfers: Roku is a global company with affiliates, varied business processes, management structures and technical systems that cross borders. Information collected by Roku or on our behalf may be stored on your Roku Devices, on your mobile device if you use Roku's mobile apps, or on our servers, and may be transferred to, accessed from, or stored and processed globally in any other country where Roku or its service providers maintain facilities or call centers, including jurisdictions that may not have data privacy laws that provide protections equivalent to those provided in your home country. While such information is outside of your country of residence, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. We will protect all personal information we obtain in accordance with this Privacy Policy and take reasonable steps to ensure that it is treated lawfully.

C. Retention: Personal information we collect may be retained for as long as needed to fulfill legitimate business purposes, including the purposes outlined in "Information Usage" under Part II, or for a time period specifically required or allowed by applicable regulations or laws.

Part VII. Supplemental U.S. State Law Privacy Notice

This additional notice is for residents of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, and Virginia, and supplements the information contained in the Privacy Policy and applies to residents of those states whose data we process as a business or controller. It also describes how you exercise the rights under the California Consumer Privacy Act, the Colorado Privacy Act, the Connecticut Act Concerning Personal Data Privacy and Online Monitoring, the Delaware Personal Data Privacy Act, the Florida Digital Bill of Rights, the Indiana Consumer Data Protection Act, the Iowa Consumer Data Protection Act, the Kentucky Consumer Data Protection Act, the Maryland Online Data Privacy Act, the Minnesota Consumer Data Privacy Act, the Montana Consumer Data Privacy Act, the Nebraska Data Privacy Act, the New Hampshire Data Privacy Act, the New Jersey Data Privacy Act, the Oregon Consumer Privacy Act, the Rhode Island Data Transparency and Privacy Protection Act, the Tennessee Information Protection Act, the Texas Data Privacy and Security Act, the Utah Consumer Privacy Act, and the Virginia Consumer Data Protection Act (collectively the **“U.S. State Privacy Laws”**).

For the purpose of this section (Part VI), **“Personal Information”** means information that the laws listed in this Part VI define as “Personal Information or “Personal Data”. Personal Information does not include information that is:

- Publicly available, as defined by the applicable U.S. State Privacy Laws.
- Deidentified or aggregated.
- Otherwise excluded from the scope of the applicable U.S. State Privacy Laws.

In the event that a term used in this Part VI has a different meaning under different U.S. State Privacy Laws, such term shall have the meaning under the laws of the state in which you reside.

A. California

1. Sources of Personal Information We Collect and Process

We collect Personal Information from you when you provide it to us or automatically through the Roku Services. We may also obtain information about you from other sources, such as third-party platforms, devices and services used to access the Roku Services, Third Party Channels, content providers, data providers, ad networks and advertising partners, advertisers, service providers (including payment service providers), providers of accounts you link to your Roku account, participating merchants and their partners, and other users if they have referred you to the Roku Services or provided your information to us.

2. Categories of Personal Information We Collect, Process and Disclose to Third Parties; and the Purposes of Processing

Categories of Personal Information Being Collected and Processed	The Purposes for Processing	Categories of Third Parties to Whom the Personal Information is "Shared" for Cross-Context Behavioral Advertising or "Sold" and the Purpose
A. Identifiers, including, device identifiers, internet protocol addresses, browser cookies, and other unique online identifiers	• To provide and maintain the Roku Services, and to process and fulfill your requests or orders. • To understand and analyze our user base and how you use the Roku Services, and to	• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

- improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
 - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
 - For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
 - To measure performance and analyze key metrics relevant to our business.
 - To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
 - To enforce our terms and conditions or protect our
- App providers, where the app is installed on your Roku Device, and content providers from whom you purchase or subscribe to content (to help you discover content and provide a more tailored experience on the Roku Services, for analytics and reporting purposes by the providers, or to bring you more relevant ads and report on effectiveness of ad campaigns)
 - Third party platforms and devices you use to access the Roku Services (to help them bring you more relevant ads and report on the effectiveness of ad campaigns)

business, partners or users, and comply with our contractual and legal obligations.

- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

B. Account registration Information, i.e., name, address, email address, telephone number, and payment method and card number

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

C. Characteristics of protected classifications under California or Federal law

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

from Roku or its partners, and to measure and understand the effectiveness of our marketing.

- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts,
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.

- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

E. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)
- App providers, where the app is installed on your Roku Device, and content providers from whom you purchase or subscribe to content (to help you discover content and provide a more tailored experience on the Roku Services, for analytics and reporting purposes by the providers, or to bring you more relevant ads and report on effectiveness of ad campaigns)

- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.
- Third party platforms and devices you use to access the Roku Services (to help them bring you more relevant ads and report on the effectiveness of ad campaigns)

F. General geolocation data, such as general location and geographical

- To provide and maintain the Roku Services, and to process
- Advertisers, ad networks, advertising partners, and ad measurement providers (to

information, including designated market area, country, province, state, city, and postal code

and fulfill your requests or orders.

bring you more relevant ads and report on effectiveness of ad campaigns)

- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative

messages; and to respond to your comments and questions and provide customer service.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.
- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.

G. Precise geolocation

- To personalize your experience on the Roku Services.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

H. Audio, electronic, visual, thermal, olfactory, or similar information

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and

support and administrative messages; and to respond to your comments and questions and provide customer service.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

I. Inferences drawn from Personal Information, including your preferences, interests, and other information used to personalize your experience

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
 - To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
 - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

J. Professional or Employment Information

- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

K. Education Information

- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps,
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

L. Personal Information that reveals racial or ethnic origin, religious or philosophical beliefs, union membership, health, and wellness information

- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
 - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

M. Personal Information that reveals (a) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, (b) social security, driver's license, state identification card, or passport number, and (c) content of consumer emails, texts and messages where we are not the intended recipient

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

Over the past 12 months, Roku has disclosed for a business purpose each of the categories of Personal Information as described in the chart above to service providers and contractors.

Over the past 12 months, Roku has collected, processed, disclosed, shared for cross-context behavioral advertising, and sold each of the categories of Personal Information as described in the chart above. Roku does not have actual knowledge that it sells Personal Information or shares for cross-context behavioral advertising the Personal Information of consumers under 16 years of age.

Roku does not collect genetic or biometric information, neural data, information on sex life or sexual orientation, or citizenship or citizenship status.

3. Retention

Personal Information we collect may be retained for as long as needed to fulfill legitimate business purposes, including the purposes outlined in Section 2, “Categories of Personal Information We Collect, Process, and Disclose to Third Parties; and the Purposes of Processing” of this Supplemental U.S. State Law Privacy Notice, or for a time period specifically required or allowed by applicable regulations or laws.

4. Your California Privacy Rights

If you are a California resident, subject to certain exceptions, you may exercise the following rights:

- The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, the categories of Personal Information that the business sold or shared, and for each category identified, the categories of third parties to whom it sold or shared that particular category of Personal Information, and the categories of Personal Information that the business disclosed for a business purpose, and for each category identified, the categories of service providers or contractors to whom it disclosed that particular category of Personal Information.
- The right to access the specific pieces of Personal Information we have collected about you in a portable and, to the extent technically feasible, readily usable format.
- The right to correct inaccurate Personal Information that we maintain about you.
- The right to request deletion of the Personal Information that we have collected about you.
- The right to opt out of the sale of Personal Information, or the sharing of Personal Information for cross-context behavioral advertising.
- The right to limit our use or disclosure of your sensitive Personal Information, where permitted by law.
- The right to not be retaliated against for the exercise of your privacy rights.
- The right to appeal any decision with regard to your privacy request

You can submit a right to know/access, correct, and deletion request to through our [online form](#). Such requests are subject to our ability to reasonably verify your identity, where Roku has the right or obligation to do so under applicable law. If you have a Roku account, we will verify your identity by asking you to log into your account. If you don't have a Roku account, we will attempt to verify your identity by asking you to provide (through the [online form](#) or via privacy@roku.com) data elements that we may have collected about you, such as your device type, device ID, and cookie ID.

You can exercise your right to opt out of the “sale” of your Personal Information, or the “sharing” of your Personal Information for cross-context behavioral advertising, and limit our use of your sensitive Personal Information, where permitted by law, by visiting Roku's [Your Privacy Choices page](#) or visiting the Privacy section of the Settings menu of your Roku players and Roku TV models. If you are visiting any Roku Site using a web browser with the [Global Privacy Control](#) (“GPC”) signal enabled, we will treat the GPC signal as a “sale” and “sharing” opt-out request. When you are logged into your Roku account, we honor a GPC signal as a request to opt out of the “sale” and “sharing” of personal information for that account. When you are not logged into a Roku account or you do not have a Roku account, we honor a GPC signal as a request to opt out of the “sale” and “sharing” of personal information for the browser from which the signal is received, subject to our ability to associate the signal with your information.

Where permitted by applicable law, you may authorize another person (your “**Authorized Agent**”) to submit a request on your behalf through the methods described above. Your Authorized Agent should submit proof that you gave the agent signed permission to submit the request. We may still require you to directly verify your identity and directly confirm that you have provided the Authorized Agent permission to submit the request. If you have questions about our Privacy Policy, please email privacy@roku.com.

5. California’s Shine-the-Light Law.

California’s Shine the Light law permits California residents to request and receive, once per calendar year and free of charge, information about our sharing of your Personal Information (if any) with third parties for their own direct marketing use. If you are a California resident and would like to make such a request, please email privacy@roku.com. In your request, please include your name and attest to the fact that you are a California resident and provide a current California address. We may ask you for additional information to confirm your identity before responding to this request.

B. Colorado, Connecticut, Delaware, Florida, Indiana, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, and Virginia

1. Sources of Personal Information We Collect and Process

We collect Personal Information from you when you provide it to us or automatically through the Roku Services. We may also obtain information about you from other sources, such as third-party platforms, devices and services used to access the Roku Services, Third Party Channels, content providers, data providers, ad networks and advertising partners, advertisers, service providers (including payment service providers), providers of accounts you link to your Roku account, participating merchants and their partners, and other users if they have referred you to the Roku Services or provided your information to us.

2. Categories of Personal Information We Collect, Process and Disclose to Third Parties; and the Purposes of Processing

Categories of Personal Information Being Collected and Processed	The Purposes for Processing	Categories of Third Parties to Whom the Personal Information Is Disclosed	Categories of Third Parties to Whom the Personal Information is "Sold" and the Purpose
A. Identifiers, including, device identifiers, internet protocol addresses, browser cookies, and other unique online identifiers	• To provide and maintain the Roku Services, and to process and fulfill your requests or orders. • To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku’s advertising services in order to better serve our advertisers), and to	• Service providers and vendors • App and content providers • Advertisers, ad networks and advertising partners • Advertising measurement providers • Third party platforms and devices you use to access the Roku Services	• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) • App providers, where the app is installed on your Roku Device, and content providers from whom you purchase or subscribe to

develop new products, services, features and functionality.	• Voice assistant providers • Our affiliates • Law enforcement or others involved with legal, security and safety matters, processes and requests • Other users of the Roku Services • Merchants and their partners you transact with on Roku Services	content (to help you discover content and provide a more tailored experience on the Roku Services, for analytics and reporting purposes by the providers, or to bring you more relevant ads and report on effectiveness of ad campaigns)
• To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations. • To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns. • For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing. • To measure performance and analyze key metrics relevant to our business.		• Third party platforms and devices you use to access the Roku Services (to help them bring you more relevant ads and report on the effectiveness of ad campaigns)

- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

B. Account registration Information, i.e., name, address, email address, telephone number, and payment method and card number

- | | |
|---|---|
| <ul style="list-style-type: none"> • To provide and maintain the Roku Services, and to process and fulfill your requests or orders. • To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality. | <ul style="list-style-type: none"> • Service providers and vendors • Channel and content providers from whom you are purchasing or subscribing • Our affiliates • Law enforcement or others involved with legal, security and safety matters, processes and requests • Merchants and their partners you transact with on Roku Services |
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- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal

activity, including click fraud.

C. Characteristics of protected classifications under Federal law to the extent they are not "sensitive data" under applicable U.S. State Privacy Laws

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
 - To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
 - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired
- Service providers and vendors
 - App and content providers
 - Advertisers, ad networks and advertising partners
 - Advertising measurement providers
 - Our affiliates
 - Law enforcement or others involved with legal, security and safety matters, processes and requests
- Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies

- | | | |
|--|---|---|
| <ul style="list-style-type: none">• To provide and maintain the Roku Services, and to process and fulfill your requests or orders.• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality. | <ul style="list-style-type: none">• Service providers and vendors• App and content providers• Advertisers, ad networks and advertising partners• Advertising measurement providers• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) |
|--|---|---|

- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- Merchants and their partners you transact with on Roku Services
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as

confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

E. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement

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| <ul style="list-style-type: none">• To provide and maintain the Roku Services, and to process and fulfill your requests or orders.• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.• To personalize your experience on the Roku Services, | <ul style="list-style-type: none">• Service providers and vendors• App and content providers• Advertisers, ad networks and advertising partners• Advertising measurement providers• Third party platforms and devices you use to access the Roku Services• Voice assistant providers• Our affiliates• Law enforcement or others involved with legal, | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)• App providers, where the app is installed on your Roku Device, and content providers from whom you purchase or subscribe to content (to help you discover content and provide a more tailored experience on the Roku Services, for analytics and |
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including suggesting and offering you relevant content and recommendations.

security and safety matters, processes and requests

reporting purposes by the providers, or to bring you more relevant ads and report on effectiveness of ad campaigns)

- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- Other users of the Roku services when you use certain features of our service (e.g., when you post on Roku Community, upload product reviews or content)
- Third party platforms and devices you use to access the Roku Services (to help them bring you more relevant ads and report on the effectiveness of ad campaigns)
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security

alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

F. General geolocation data, such as general location and geographical information, including designated market area, country, province, state, city, and postal code

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| <ul style="list-style-type: none">• To provide and maintain the Roku Services, and to process and fulfill your requests or orders.• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.• To personalize your experience on the Roku Services, including suggesting and offering you | <ul style="list-style-type: none">• Service providers and vendors• Advertisers, ad networks and advertising partners• Advertising measurement providers• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) |
|---|---|---|

relevant content and recommendations.

- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and

administrative messages; and to respond to your comments and questions and provide customer service.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.

- To personalize your experience on the Roku Services.

- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

- Service providers and vendors

- Our affiliates

- Law enforcement or others involved with legal, security and safety matters, processes and requests

G. Precise geolocation

H. Audio, electronic, visual, thermal, olfactory, or similar information

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.

- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance

- Service providers and vendors

- App and content providers

- Voice assistant providers

- Our affiliates

- Law enforcement or others involved

	the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality. • To measure performance and analyze key metrics relevant to our business. • To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service. • To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations. • To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.	with legal, security and safety matters, processes and requests • Other users of the Roku Services	
I. Inferences drawn from Personal Information, including your preferences, interests, and other information used to	• To provide and maintain the Roku Services, and to process and fulfill your requests or orders.	• Service providers and vendors • Advertisers, ad networks and advertising partners	• Advertisers, ad networks, advertising partners, and ad measurement providers (to

personalize your experience

- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products,

- Advertising measurement providers and services
- Our affiliates
- Law enforcement or others involved with legal, security and safety matters, processes and requests

bring you more relevant ads and report on effectiveness of ad campaigns)

events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.

- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

J. Professional or Employment Information

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| <ul style="list-style-type: none">• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising | <ul style="list-style-type: none">• Service providers and vendors• Advertisers, ad networks and advertising partners• Advertising measurement providers | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on |
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- services in order to better serve our advertisers), and to develop new products, services, features and functionality.
- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and
- Our affiliates
- Law enforcement or others involved with legal, security and safety matters, processes and requests
- effectiveness of ad campaigns)

analyze key metrics relevant to our business.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

K. Education Information

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|---|---|---|
| <ul style="list-style-type: none">• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.• To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.• To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and | <ul style="list-style-type: none">• Service providers and vendors• Advertisers, ad networks and advertising partners• Advertising measurement providers• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) |
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advertising partners reach the desired audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

- Service providers and vendors.
- Our affiliates.
- Law enforcement or others involved with legal, security and safety matters, processes and requests.
- Merchants and their partners you transact with on Roku Services.

L. Personal Information that reveals (a) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, (b) social security, driver's license, state identification card, or passport number, and (c) content of consumer emails, texts and messages where we are not the intended recipient

Unless prohibited by applicable law, data collected from you or your devices may be used to improve Roku's internal machine learning models, which are used for purposes such as recommending content and apps to you. This may constitute "training" of "large language models" under certain applicable laws.

Roku does not have actual knowledge that it sells Personal Information of consumers under 16 years of age.

If we process deidentified data provided to us by third parties, we will not attempt to reidentify it if we are prohibited by applicable law from doing so.

3. Retention

Personal Information we collect may be retained for as long as needed to fulfill legitimate business purposes, including the purposes outlined in Section 2, "Categories of Personal Information We Collect, Process, and Disclose to Third Parties; and the Purposes of Processing" of this Supplemental U.S. State Law Privacy Notice, or for a time period specifically required or allowed by applicable regulations or laws.

4. Your Privacy Rights

Some states provide consumers certain rights regarding their Personal Information. Depending on where you live and subject to certain exceptions, you may exercise the following rights:

- The right to confirm whether we are processing your Personal Information and to access the specific pieces of Personal Information we have collected about you in a portable and, to the extent technically feasible, readily usable format.
- The right to correct inaccurate Personal Information that we maintain about you.
- The right to request deletion of the Personal Information that we have collected about you.
- The right to opt out of the processing of your Personal Information for targeted advertising.
- The right to opt out of the sale of your Personal Information.
- The right to limit our collection, use or disclosure of your sensitive Personal Information, where permitted by law.
- The right to be free from discriminatory treatment for the exercise of your privacy rights.
- The right to appeal any decision with regard to your privacy request.
- The right to opt-out of profiling in furtherance of producing legal or significant decisions concerning you, query the decision, be informed of reasons for the decision and what actions would secure a different decision, review and correct any inaccurate personal information used to make the decision, and have the decision re-evaluated. We do not engage in such profiling.
- The right to opt out of any voice or facial recognition features.
- The right to obtain a list of specific third parties, other than natural persons, to which we have disclosed Personal Information.

You can submit an access, correction, deletion, and appeal request through our [online form](#) or via e-mail at privacy@roku.com. Such requests are subject to our ability to reasonably verify your identity, where Roku has the right or obligation to do so under applicable law. If you have a Roku account, we will verify your identity by asking you to log into your account. If you don't have a Roku account, we will attempt to verify your identity by asking you to provide (through the [online form](#) or via privacy@roku.com) data elements that we may have collected about you, such as your device type, device ID, and cookie ID.

You can exercise your right to opt out of the processing of your Personal Information for targeted advertising or the “sale” of your Personal Information by visiting Roku’s [Your Privacy Choices page](#) or Privacy section of the Settings menu of your Roku players and Roku TV models. Where required by law, if you are visiting any Roku Site using a web browser with the [Global Privacy Control](#) (“GPC”) signal enabled, we will treat the GPC signal as a request to opt out of the use of your Personal Information for targeted advertising and the “sale” of your Personal Information.

Where permitted by applicable law, you may authorize another person (your “**Authorized Agent**”) to submit a request on your behalf through the methods described above. Your Authorized Agent should submit proof that you gave the agent signed permission to submit the request. We may still require you to directly verify your identity and directly confirm that you have provided the Authorized Agent permission to submit the request. If you have questions about our Privacy Policy, please email privacy@roku.com.

C. Iowa and Utah

Iowa and Utah Residents: You can opt out of our processing of Personal Information that Iowa and Utah law considers to be sensitive by visiting [Your Privacy Choices page](#) or the privacy settings on your Roku device.

1. Sources of Personal Information We Collect and Process

We collect Personal Information from you when you provide it to us or automatically through the Roku Services. We may also obtain information about you from other sources, such as third-party platforms, devices and services used to access the Roku Services, Third Party Channels, content providers, data providers, ad networks and advertising partners, advertisers, service providers (including payment service providers), providers of accounts you link to your Roku account, participating merchants and their partners, and other users if they have referred you to the Roku Services or provided your information to us.

2. Categories of Personal Information We Collect, Process and Disclose to Third Parties; and the Purposes of Processing

Categories of Personal Information Being Collected and Processed	The Purposes for Processing	Categories of Third Parties to Whom the Personal Information Is Disclosed	Categories of Third Parties to Whom the Personal Information is Disclosed for Targeted Advertising or “Sold” and the Purpose
A. Identifiers, including, device identifiers, internet protocol addresses, browser cookies, and other unique online identifiers	• To provide and maintain the Roku Services, and to process and fulfill your requests or orders. • To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku’s advertising services in order to better serve our	• Service providers and vendors • App and content providers • Advertisers, ad networks and advertising partners • Advertising measurement providers	• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) • App providers, where the app is installed on your Roku Device, and content providers

advertisers), and to develop new products, services, features and functionality.

- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.

- Third party platforms and devices you use to access the Roku Services
- Voice assistant providers
- Our affiliates
- Law enforcement or others involved with legal, security and safety matters, processes and requests
- Other users of the Roku Services
- Merchants and their partners you transact with on Roku Services

from whom you purchase or subscribe to content (to help you discover content and provide a more tailored experience on the Roku Services, for analytics and reporting purposes by the providers, or to bring you more relevant ads and report on effectiveness of ad campaigns)

- Third party platforms and devices you use to access the Roku Services (to help them bring you more relevant ads and report on the effectiveness of ad campaigns)

- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

B. Account registration Information, i.e., name, address, email address, telephone number, and payment method and card number

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| <ul style="list-style-type: none"> • To provide and maintain the Roku Services, and to process and fulfill your requests or orders. • To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality. • To personalize your experience on the Roku Services, including suggesting and offering you relevant | <ul style="list-style-type: none"> • Service providers and vendors • Channel and content providers from whom you are purchasing or subscribing • Our affiliates • Law enforcement or others involved with legal, security and safety matters, processes and requests • Merchants and their partners you transact with on Roku Services |
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content and recommendations.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

C. Characteristics of protected classifications under Federal law

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| • To provide and maintain the Roku Services, and to process and fulfill your requests or orders. | • Service providers and vendors | • Advertisers, ad networks, advertising partners, and ad measurement |
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- To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
 - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
 - For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and
- App and content providers
 - Advertisers, ad networks and advertising partners
 - Advertising measurement providers
 - Our affiliates
 - Law enforcement or others involved with legal, security and safety matters, processes and requests
- providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

understand the effectiveness of our marketing.

- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies

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| <ul style="list-style-type: none">• To provide and maintain the Roku Services, and to process and fulfill your requests or orders.• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.• To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.• To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and | <ul style="list-style-type: none">• Service providers and vendors• App and content providers• Advertisers, ad networks and advertising partners• Advertising measurement providers• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests• Merchants and their partners you transact with on Roku Services | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) |
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understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

E. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement

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| <ul style="list-style-type: none"> • To provide and maintain the Roku Services, and to process and fulfill your requests or orders. • To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality. • To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations. • To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired | <ul style="list-style-type: none"> • Service providers and vendors • App and content providers • Advertisers, ad networks and advertising partners • Advertising measurement providers • Third party platforms and devices you use to access the Roku Services • Voice assistant providers • Our affiliates • Law enforcement or others involved with legal, security and safety matters, processes and requests • Other users of the Roku services when you use certain features of our service (e.g., when you post on Roku Community, upload product reviews or content) | <ul style="list-style-type: none"> • Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) • App providers, where the app is installed on your Roku Device, and content providers from whom you purchase or subscribe to content (to help you discover content and provide a more tailored experience on the Roku Services, for analytics and reporting purposes by the providers, or to bring you more relevant ads and report on effectiveness of ad campaigns) • Third party platforms and devices you use to access the Roku Services (to help them bring you more relevant ads and report on the effectiveness of ad campaigns) |
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audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

F. General geolocation data, such as general location and

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| • To provide and maintain the Roku Services, and to | • Service providers and vendors | • Advertisers, ad networks, advertising |
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geographical information, including designated market area, country, province, state, city, and postal code	- process and fulfill your requests or orders. - To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality. - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations. - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns. - For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions	- Advertisers, ad networks and advertising partners - Advertising measurement providers - Our affiliates - Law enforcement or others involved with legal, security and safety matters, processes and requests	partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)
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and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.

- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

G. Precise geolocation

- | | |
|--|---|
| <ul style="list-style-type: none">• To provide and maintain the Roku Services, and to process and fulfill your requests or orders.• To personalize your experience on the Roku Services.• To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal | <ul style="list-style-type: none">• Service providers and vendors• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests |
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activity, including click fraud.

H. Audio, electronic, visual, thermal, olfactory, or similar information

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
 - To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To measure performance and analyze key metrics relevant to our business.
 - To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
 - To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
 - To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal
- Service providers and vendors
 - App and content providers
 - Voice assistant providers
 - Our affiliates
 - Law enforcement or others involved with legal, security and safety matters, processes and requests
 - Other users of the Roku Services

activity, including click fraud.

I. Inferences drawn from Personal Information, including your preferences, interests, and other information used to personalize your experience

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
 - To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.
 - To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
 - To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- Service providers and vendors
 - Advertisers, ad networks and advertising partners
 - Advertising measurement providers and services
 - Our affiliates
 - Law enforcement or others involved with legal, security and safety matters, processes and requests
 - Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns)

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To communicate with you, including sending you service information such as confirmations, invoices, notices, updates, security alerts, user surveys, and support and administrative messages; and to respond to your comments and questions and provide customer service.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.
- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.

J. Professional or Employment Information

- | | | |
|---|--|---|
| <ul style="list-style-type: none"> • To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building | <ul style="list-style-type: none"> • Service providers and vendors • Advertisers, ad networks and advertising partners | <ul style="list-style-type: none"> • Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more |
|---|--|---|

correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.

- To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.
- To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.
- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics

- Advertising measurement providers
- Our affiliates
- Law enforcement or others involved with legal, security and safety matters, processes and requests

relevant ads and report on effectiveness of ad campaigns)

relevant to our business.

- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

K. Education Information

- | | | |
|---|---|---|
| <ul style="list-style-type: none">• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.• To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.• To show you ads (including targeted ads) through the Roku Services, on Third-Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure | <ul style="list-style-type: none">• Service providers and vendors• Advertisers, ad networks and advertising partners• Advertising measurement providers• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) |
|---|---|---|

and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

L. Personal Information that reveals racial or ethnic origin, religious beliefs, health, and wellness information

- | | | |
|--|---|---|
| <ul style="list-style-type: none">• To understand and analyze our user base and how you use the Roku Services, and to improve and enhance the Roku Services (including building correlations for use in Roku's advertising services in order to better serve our advertisers), and to develop new products, services, features and functionality.• To personalize your experience on the Roku Services, including suggesting and offering you relevant content and recommendations.• To show you ads (including targeted ads) through the Roku Services, on Third- | <ul style="list-style-type: none">• Service providers and vendors• Advertisers, ad networks and advertising partners• Advertising measurement providers• Our affiliates• Law enforcement or others involved with legal, security and safety matters, processes and requests | <ul style="list-style-type: none">• Advertisers, ad networks, advertising partners, and ad measurement providers (to bring you more relevant ads and report on effectiveness of ad campaigns) |
|--|---|---|

Party Channels, and on third-party websites, mobile apps, platforms and devices. We use your information to measure and understand the reach, viewership, and effectiveness of advertising, and provide advertising analytics and reporting. We also help advertisers and advertising partners reach the desired audience and understand, measure and improve their ad campaigns.

- For marketing purposes, including to send you alerts, notifications, emails and text messages, about products, events, promotions and offers from Roku or its partners, and to measure and understand the effectiveness of our marketing.
- To measure performance and analyze key metrics relevant to our business.
- To enforce our terms and conditions or protect our business, partners or users, and comply with our contractual and legal obligations.

M. Personal Information that reveals (a) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an

- To provide and maintain the Roku Services, and to process and fulfill your requests or orders.
- To enforce our terms and conditions or protect our business,
- Service providers and vendors
- Our affiliates
- Law enforcement or others involved with legal,

account, (b) social security, driver's license, state identification card, or passport number, and (c) content of consumer emails, texts and messages where we are not the intended recipient

partners or users, and comply with our contractual and legal obligations.

security and safety matters, processes and requests

- To protect, investigate, and deter against fraudulent, unauthorized, infringing or illegal activity, including click fraud.
- Merchants and their partners you transact with on Roku Services

Roku does not have actual knowledge that it processes the Personal Information of consumers under 13 years of age.

3. Retention

Personal Information we collect may be retained for as long as needed to fulfill legitimate business purposes, including the purposes outlined in Section 2, "Categories of Personal Information We Collect, Process, and Disclose to Third Parties; and the Purposes of Processing" of this Supplemental U.S. State Law Privacy Notice, or for a time period specifically required or allowed by applicable regulations or laws.

4. Your Iowa and Utah Privacy Rights

If you are an Iowa or Utah resident, subject to certain exceptions, you may exercise the following rights:

- The right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, selling, or sharing Personal Information, and the categories of third parties to whom we disclose Personal Information.
- The right to access the specific pieces of Personal Information we have collected about you in a portable and, to the extent technically feasible, readily usable format.
- The right to correct inaccurate Personal Information that we maintain about you.
- The right to request deletion of the Personal Information that we have collected about you.
- The right to opt out of the sale of Personal Information, or the processing of Personal Information for targeted advertising.
- The right to limit our use or disclosure of your sensitive Personal Information, where permitted by law.
- The right to be free from discriminatory treatment for the exercise of your privacy rights.
- The right to appeal any decision with regard to your privacy request

You can submit a right to know/access, correct, and deletion request to through our [online form](#). Such requests are subject to our ability to reasonably verify your identity, where Roku has the right or obligation to do so under applicable law. If you have a Roku account, we will verify your identity by asking you to log into your account. If you don't have a Roku account, we will attempt to verify your identity by asking you to provide (through the [online form](#) or via privacy@roku.com) data elements that we may have collected about you, such as your device type, device ID, and cookie ID.

You can exercise your right to opt out of the “sale” of your Personal Information, or the processing of your Personal Information for targeted advertising, and limit our use of your sensitive Personal Information, where permitted by law, by visiting Roku’s [Your Privacy Choices page](#) or visiting the Privacy section of the Settings menu of your Roku players and Roku TV models. If you are visiting any Roku Site using a web browser with the [Global Privacy Control](#) (“GPC”) signal enabled, we will treat the GPC signal as a “sale” opt-out request.

Where permitted by applicable law, you may authorize another person (your **“Authorized Agent”**) to submit a request on your behalf through the methods described above. Your Authorized Agent should submit proof that you gave the agent signed permission to submit the request. We may still require you to directly verify your identity and directly confirm that you have provided the Authorized Agent permission to submit the request. If you have questions about our Privacy Policy, please email privacy@roku.com.

Part VIII. Modifications

We may amend this Privacy Policy at any time by posting the amended version on the applicable Roku Site or by providing such notice about or obtaining consent to changes as may be required by applicable law.

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