

Privacy Notice

Effective Date: July 2018; Last Updated: July 1, 2023

Visit our Privacy Pledge located [here](#) to learn more about Arlo’s commitment to privacy.

Applicability

This Privacy Notice (“**Notice**”) explains the types of personal information and other non-personal information (collectively, “**Information**”) Arlo Technologies, Inc. and its affiliates and subsidiaries (collectively, “**Arlo**”) obtain about Arlo customers and other individuals, how Arlo uses that Information and with whom it may be shared, and the choices available to you regarding how Arlo collects, stores, and uses that Information.

This Notice applies to Arlo’s external-facing operations, including our website, mobile applications, and any other of our products, hardware, and services that link to this Notice (collectively, “**Services**”), and applies to the Information Arlo obtains in various contexts.

We may provide different or additional privacy notices in connection with certain activities, products, services, or platforms that may not be included in this Notice to supplement or clarify our privacy practices or provide you with additional choices regarding your Information with respect to those activities, products, services, and platforms.

Information We May Collect, Use, and Disclose

The nature of our relationship with you and how you choose to use Arlo’s Services determines the types of Information we may collect, use, and disclose. Below, the chart lists the types of Information Arlo collects or has collected prior to the effective date of this Notice, and for each category, how we collect the Information, how we use the Information, and the applicable retention period.

Types of Information We Collect (Depending on the nature of our relationship with you and how you use the Services)	How and Where We Collect Information	Why We Collect, Use and Disclose Information
<p>We may collect personal identifiers.</p> <p>This includes Information such as your name, postal address, phone number, email address, unique device identifier, and your Internet Protocol (IP) address.</p> <p>If you use emergency response, you may also choose to provide Information to assist first responders. For example, demographic Information or preferred language.</p>	<p>We may collect this Information directly from you.</p> <p>We may collect this Information passively based on your settings, your consent, and/or how you interact with the Services.</p> <p>We may collect Information about you provided by another user, for example when they invite you to share access to their account or add you as a contact in their account.</p>	<p>To provide Arlo Services to you.</p> <p>To establish and manage your Arlo account.</p> <p>To communicate with you.</p> <p>To allow you to interact with certain third-party products or services (such as local emergency response services).</p> <p>To send you information about products or services we think you</p>

		<p>might find interesting, if you have opted in or not opted out of this communication.</p> <p>To carry out our legal obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.</p> <p>To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.</p> <p>To identify and evaluate job applicants, verify applicant Information, and keep records related to our hiring processes.</p>
<p>We may collect personal Information categories listed in the California Customer Records statute. Cal. Civ. Code § 1798.80(e).</p> <p>When you buy a product or purchase a subscription, we collect billing Information such as your form of payment and billing address.</p> <p>Your full payment card Information is provided directly to the third-party payment processor.</p> <p>Some Information included in this category may overlap with other categories.</p>	<p>We may collect this Information directly from you.</p> <p>We may collect this Information from our service providers, financial institutions, and payment processors.</p>	<p>To fulfil the purpose for which the Information was provided to us.</p> <p>To process your payment, issue refunds and collections, and for internal business purposes such as fraud prevention and finance & accounting functions.</p> <p>To provide support to you.</p> <p>To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.</p> <p>To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.</p>
<p>We may collect Information related to protected classifications under relevant state or federal laws.</p> <p>If you choose to provide Arlo with optional Information in your emergency response profile, we may collect Information related to your sex, gender expression, or age (including in the form of date of birth).</p>	<p>We may collect this Information directly from you.</p>	<p>To assist emergency responders in locating a person in the event of an emergency.</p>

<p>We may collect commercial Information.</p> <p>We may collect Information related to the Services you purchase or devices you connect to your account. We may collect Information when you are interacting with our customer service team.</p>	<p>We may collect this Information directly from you.</p> <p>We may collect this Information passively from you as part of your interactions with the Services or when you contact our customer service team.</p>	<p>To communicate with you about the Services or devices connected to your account.</p> <p>To provide support to you.</p> <p>To send you information about products or services we think you might find interesting.</p> <p>To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.</p> <p>To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.</p>
<p>We may collect internet or other electronic network activity Information.</p> <p>We collect Information related to website and mobile application usage. We collect Information from and about your device. This also includes Information about any connected third-party devices. For example, Internet speed, IP address, voltage, storage, error rates, length of connection time, the browser or device you are using, data from cookies, pixel tags or other online tools. We may also collect device identifiers. For example, this may include your operating system, hardware model, and mobile carrier. This may also include Information collected automatically through session replay and other tracking technologies.</p>	<p>We collect this Information directly from you.</p> <p>We collect this Information passively when you interact with the Services.</p>	<p>To provide and improve our Services.</p> <p>To provide support to you.</p> <p>To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.</p> <p>To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.</p>
<p>We may collect geolocation data.</p> <p>We may collect general location Information such as your zip code and state. Based on your IP address, we may also derive location Information such as country.</p>	<p>We collect this Information based on your settings, your consent, and/or how you interact with the Services.</p>	<p>To provide the Services.</p> <p>To fulfil the purpose for which the Information was provided to us.</p> <p>To assist emergency responders in locating a person in the event of an emergency.</p>

<p>We may collect approximate or precise location Information depending on the settings you enable on your mobile device for features such as geofencing and for the Arlo Safe app.</p> <p>Some of this may be considered sensitive personal Information, such as when we collect precise geolocation, meaning any geolocation data that is derived from a device and that is used or intended to be used to locate an individual within a legally defined geographic area.</p>		
<p>We may collect audio, visual, or similar Information.</p> <p>If enabled by you and with your consent, we may collect audio, video, and still-image recordings, photographs, or call center recordings. We also may obtain data collected from the Services’ surrounding environments such as motion, temperature, light, or sound. If you use Arlo Safe and enable automatic crash detection, we collect sensory and motion data from your mobile device. This may include Information from the gyroscope, accelerometer, compass, and Bluetooth.</p> <p>We also collect donated videos. This may include audio, video, and still-image recordings that you select from your library and provide permission for Arlo to use for our research and development purposes.</p>	<p>We may collect this Information directly from you.</p> <p>We may collect this Information passively based on your settings and how you interact with the Services.</p>	<p>To provide the Services</p> <p>To provide support to you.</p> <p>Donated videos may be used for research and development to improve our Services.</p>
<p>We may collect professional or employment related Information.</p> <p>We may also collect business contact details to provide our Services at a business level.</p> <p>If you apply for a job at Arlo, we collect Information about you, which may include your prior education and work</p>	<p>We collect this Information directly from you.</p> <p>We may collect this Information from governmental entities or, with your permission, your former employers.</p>	<p>To carry out our obligations and enforce our rights arising from any contracts entered between you and us.</p> <p>To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.</p>

<p>history. We collect your resume and Information about your skills and qualifications for the position.</p>		<p>To identify and evaluate job applicants, verify applicant information, and keep records related to our hiring processes.</p>
<p>We may make inferences drawn from any of the Information collected.</p> <p>We may use Information from the categories described above to create a profile about you to personalize your experience by reflecting your preferences, behavior, and attitude.</p>	<p>We collect this Information passively based on your interactions with the Services or our customer support team.</p>	<p>To communicate with you.</p> <p>To provide support to you.</p> <p>To send you information about products or services we think you might find interesting.</p> <p>To carry out our obligations and enforce our rights arising from any contracts entered between you and us, including for billing and collection.</p> <p>To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.</p>
<p>We may collect sensitive personal Information.</p> <p>As indicated above, certain Information that you choose to provide depending on the nature of your relationship with us may be considered sensitive personal Information under applicable law.</p>	<p>We collect this Information directly from you or passively through your interactions with the Services.</p>	<p>To provide the Services.</p> <p>To fulfil the purpose for which the Information was provided to us.</p> <p>To assist emergency responders in locating a person in the event of an emergency.</p>

Employees may provide additional Information through job applications, benefits enrollment, payroll or direct deposit enrollment, or other parts of the employment process. We maintain a separate privacy notice for employees.

We retain Information as long as your account is active, for the period necessary or relevant for the practices described in this Notice, and as otherwise required by law.

Disclosure of Information

As part of our business there are times that we may disclose Information with others. You can find out more about that below:

We disclose Information within our family of companies. This includes current and future affiliates and subsidiaries.

We disclose Information to your family, friends, emergency contacts, at your direction. The Services are designed to allow you to share your Arlo device access and alerts if you choose. With Arlo Safe, you may also choose to share your location data with others by sending them an invitation link. You can modify with whom you disclose Information on your own through your account settings. If an emergency occurs, we will also share Information with persons you designate as emergency contacts.

We disclose Information to our service providers and contractors. We may disclose Information with companies that help us deliver and operate our Services. Depending on the Services you enable, this may include providing service providers and contractors with Information (including location) related to crash detection, emergency response and dispatch support, and other features available as part of the Services.

We disclose and share Information with advertising and analytics providers, including third parties. We use several modern marketing tools in support of our advertising efforts. Arlo may work with first-party and third-party advertisers and analytics providers that use cookies and similar technologies to provide more relevant advertising about Arlo Products and Services on our websites and across the internet. We also use tools to help us measure the effectiveness of our advertising efforts. To learn more, please click [here](#). To opt out, set your preferences by clicking on the Your Privacy Choices link in the footer of your browser.

We disclose Information with connected products and services. You may choose to connect your Arlo account to third-party products and services. You will be asked if you want to grant this connection. If you do, certain Information such as device serial number and settings may be disclosed. You can modify your choice to connect accounts in your account settings.

We may disclose Information to the extent necessary to comply with the relevant laws or to protect our company and users. We may disclose Information to respond to a court order, legal request, or subpoena, including to law enforcement in response to a legally enforceable search warrant as described in our law enforcement guidelines [here](#). We may also disclose Information in response to valid government or regulatory demands and requests. We may also disclose Information when we investigate potential fraud, abuse, or other similar violations of Arlo Terms. We may also disclose Information to protect the rights, property, or safety of our business, our employees, our customers, or others. This may also include exchanging Information with other companies and organizations for the purposes of cybersecurity, fraud protection, and credit risk reduction, or to stop or prevent illegal activity.

We may disclose Information with any successor to all or part of our business. If all or part of our business is sold, we are part of a merger or acquisition, or there is a financing or insolvency agreement, we may disclose Information as part of that settlement.

We may also disclose Information for other reasons, which we will describe to you.

We may disclose aggregated Information that does not identify any individual, without restriction. We may share non-personal Information without restriction.

Why We Use Information

Depending on the nature of our relationship with you and how you choose to use the Services, we may use Information for the following:

We use Information to communicate with you. We use Information to respond to your questions, including questions about our Services or your relationship with us, and to communicate with you about this Notice or our Terms. We may also contact you about your feedback. We use Information you provide to send you alerts and other notifications. If you apply for a job with us, we use that Information to process your application.

We use limited video Information for device set up and use to provide Services. We use artificial intelligence to process certain video Information from your cameras so that we can monitor your environment, send you alerts, and allow you to further configure your Services. For example, you may configure your Services to send an alert to you based on the type of activity that has been detected. Depending on your subscription plan, configuration and settings, we store the videos you capture for various time periods.

We use Information to provide and improve our Services. We use Information to provide the Services, including emergency response. If you enable your location settings, we may use this location Information to support geo-fencing and some Arlo Safe features. We use Information to develop and improve our Services. Your videos are generally accessed by Arlo only through artificial intelligence, but when videos are “donated” to Arlo as described here, Arlo employees or Arlo’s contractors or service providers may potentially view them. You must select individual video recordings from your video library to “donate” to Arlo. If you select this “donate” option, we may use and view the donated video recording for research and Services development purposes. We also use Information to analyze trends and customize your experience and do this, for example, by saving certain preferences you choose.

We use some Information for marketing purposes. We use your Information to share updates about new products and special offers, including promotions, surveys, and contests. These updates may include information about Arlo’s new features and Services or information about select third-party offers or products we think you might find interesting, but we will not send your Information to these third-parties to use for their own marketing purposes. We’ll give you these updates and information through email, on our apps, or on social media platforms.

We use Information to protect our company and users. We use Information to protect our company and users, for example to identify fraud, protect accounts, or protect Arlo’s infrastructure. This includes using Information to identify and stop prohibited or illegal activity.

Our basis for processing Information. Our basis for processing your Information for the reasons described above is typically to perform a contract, including responding to your requests. For example, this includes providing customer service. Where this applies, if you choose not to provide Information, we may be unable to perform the contract or respond to your request. We also process Information based on your consent. Where you have provided consent, you have the right to withdraw it. We also use Information about you when we have a legitimate purpose in doing so like helping secure and improve the Services.

We also use Information as we may describe to you in the future.

How We Collect Information

Like many other companies, there are different ways that we collect Information. We have outlined them below:

We collect Information directly from you. You might provide us Information in several ways. For example, we collect Information when you create an account or register a product. We also collect Information when you make a purchase, change or alter your Services or subscriptions, contact us, sign up for special offers, or participate in a survey, contest, promotion or sweepstakes. We collect any other Information you voluntarily provide to us when using the Services, including user contributions or public postings on our social media sites. For more sensitive Information collection, we ask for your consent. We also collect Information from your devices through use of the camera, microphone, location services or other usage, consistent with your chosen settings, configurations, and permissions.

We collect Information passively. We use tracking tools to collect Information from you passively. These tools include browser cookies, pixels, session replays, and web beacons. We use these on our sites and in emails that we send to you.

We get Information about you from third parties or other sources. Third party products or apps may also share Information about you. For example, usage data from your integrated products may be provided to us. We may get sensory and motion data from your mobile device. We may also collect Information about you from other users, including your name, phone number, or email address. Arlo users may also provide names and images to associate with friends and family and other household members. If you provide Information about another person, it is your responsibility to ensure you have that party's permission. Arlo also utilizes service providers to assist with marketing and research initiatives and may obtain Information about you from those providers. We may also obtain Information about you from governmental or public sources.

We combine Information. Our Services provide integrated security solutions, which means we may combine Information that we have collected directly from you, from across your devices, products, or Services, or that is received from a third party. If we combine or connect non-personal information with personal Information so that it directly or indirectly identifies an individual or so that we may draw inferences about an individual, we treat the combined Information as personal Information and, when applicable, sensitive personal Information.

Your Rights and Choices

You may have certain rights and choices about your Information. Certain of these rights are available to individuals when acting as consumers. Some of these rights do not extend to individuals who may be acting in their business capacity or as an employee. These rights include:

You can control certain settings on your mobile device or account settings. For example, you can turn off or modify the location services or push notifications on your mobile phone, or customize your video and/or audio capture configuration from your account. You can review and change certain account Information or delete video or audio when logged into your account.

You can opt out of certain marketing. To stop receiving our promotional emails or communications follow the instructions at the bottom of any promotional message you receive from us. If you opt out of receiving marketing messages, you will continue to receive non-marketing messages from us about your relationship with us where permitted by law. For example, you may continue to receive messages from Arlo about technical updates and security, even after opting out of receiving marketing messages.

You can control cookies and tracking tools. Our website is configured to respond to common browser opt-out signals, such as Do Not Track or Global Privacy Control. You can also opt out of sharing your

Information for online advertising purposes on our website directly by adjusting your preferences. Click on the Your Privacy Choices link in the footer of your browser. To learn how to manage how we, and our vendors, use cookies and other tracking tools, please click [here](#).

Privacy Rights. In some places laws grant residents certain privacy rights related to their personal Information. Read on to learn more about the different rights.

Right to Know and Data Portability/Access. You have the right to request that we disclose certain information to you about our collection and processing of your Information. Once we receive your request and confirm your identity, we will disclose to you:

- The categories of personal Information we collected about you.
- The categories of sources for the personal Information we collected about you.
- Our business or commercial purpose for collecting, selling, or sharing that personal Information.
- The categories of third parties to whom we disclose personal Information.
- A copy of the specific pieces of personal Information we have collected about you in a portable format.

You can also review and access your Information through your account settings by logging in [here](#) or through the mobile application.

Right to Delete. You have the right to request that we delete any of your personal Information that you have provided or that we have collected and processed about you, subject to certain exceptions. Once we receive your request and confirm your identity, we will review your request to see if an exception requiring us to retain the Information applies. We will delete or deidentify personal Information not subject to one of these exceptions from our records to take similar action. You may delete most Information through your account settings by logging in [here](#) or through the mobile application.

Right to Correct Inaccurate Information. If we maintain inaccurate Information about you, you have the right to request correction of that inaccurate personal Information, taking into account the nature of the Personal Information and the purposes of the personal Information processing. We will use commercially reasonable efforts to correct this Information. You may change most Information through your account settings by logging in [here](#) or through the mobile application.

Right to Limit Use and Disclosure of Sensitive Information. Arlo limits the types of sensitive Information it collects, uses, and the purposes for which it might be disclosed in order to best protect your privacy. Arlo's collection, use, and disclosure of sensitive Information falls into the limited business purposes permitted by and in compliance with applicable law.

Right to Opt-In or Opt-Out of Sharing / Sale / Right to Object. Arlo gives consumers the right to request to opt out of the processing of the personal data for purposes of (i) targeted or cross-contextual behavioral advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.

We do not exchange your Information for monetary consideration or share your Information with a third party to use for their own marketing purposes. We only engage in cross-contextual behavioral or targeted advertising through cookies and similar tracking technologies. Under certain U.S. state laws, these activities may be considered “sharing” or “selling.” We share, or have shared prior to the effective date of this Notice, identifiers such as a device ID, cookie ID, or IP address and internet/electronic network activity such as website pages visited with advertisers and advertising networks, data analytics providers and social networks through these technologies. To opt-out of this processing, we will rely on you to set your preferences regarding cookies and other tracking technologies. To do this, click on the Your Privacy Choices link in the footer of your browser.

We also do not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Arlo does not knowingly “sell” or “share” Information of minors under 16 years of age. Nevada residents may opt out of any future sale of their Information to a third party by contacting us as described at the end of this Notice.

Right to Nondiscrimination/Non-Retaliation. We will not discriminate against you for exercising any of your privacy rights unless permitted or required by law. This includes the right not to receive discriminatory treatment by us for the exercise of privacy rights, including an employee’s, applicant’s, or independent contractor’s right not to be retaliated against for the exercise of their state law privacy rights.

Financial Incentives. We may offer financial incentives to individuals who provide their email address to sign up to receive marketing and promotional emails from us. The terms of the financial incentive will be presented to you at the time you sign up. You may withdraw from any of the financial incentives by clicking on the unsubscribe link in the email messages or by contacting us as described at the end of this Notice. The value of providing your email address will vary and is based on the amount of the purchase using the initial offer and any subsequent offers received.

Exercising Your Rights. If you, or someone legally authorized to act on your behalf, wishes to exercise these rights, please visit [here](#) to exercise these as possible through your account settings and Privacy Center or log into your mobile application. Otherwise access our online form [here](#) or contact us at privacy@arlo.com. You or your authorized agent may be limited to submit certain requests within a 12-month period. Your request must:

- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- Provide sufficient Information, which will likely need to match with Information we previously collected from you, that allows us to reasonably verify you are the person about whom we collected personal Information or an authorized representative (“Authorized Agent”).

If you would like, you may designate an Authorized Agent to make a request on your behalf. We will deny requests from agents that do not submit proof of authorization from you. If you designate an Authorized Agent to make a request for you, we may require:

- A copy of a power of attorney or require that you provide the authorized agent with written permission.
- You to verify your own identity with us directly.

We will only use Information provided in the request to verify the requestor's identity or authority to make it, except for record-keeping purposes. We will delete this Information as soon as practicable, or until we no longer legally need the Information, after complying with the request.

Response Timing and Format. We will confirm receipt of your request within 10 business days. If you do not receive confirmation within the 10-day timeframe, please contact privacy@arlo.com.

We endeavor to substantively respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Appeal Process. If you would like to submit an appeal for any decision with regard to any consumer request, please email privacy@arlo.com.

Transfers and Storage of Information

Arlo is based in the United States, which means the Information we collect may be processed and stored within the United States. If you live outside of the United States and choose to use the Services, you understand that your Information may be processed and/or stored outside your country of residence, including in other jurisdictions (like the United States) that may have different data protection frameworks than your country. Information we transfer from Europe to the United States is subject to appropriate safeguards under applicable law.

Children's Privacy

Arlo does not direct our Services to children, and we do not knowingly collect Information from children. If you are a parent or legal guardian and think your child has given us Information, you can write to us or email us at the addresses provided at the end of this Notice. Please mark your inquiries "Parental Information Request." If we learn we have mistakenly or unintentionally collected or received Information from a child without appropriate consent, we will delete such Information.

How We Protect Information

The Internet is not 100% secure. We cannot promise that your use of our Services will be completely secure. We encourage you to use caution when providing your Information to others and not to share or reuse passwords.

Third-Party Services and Sites

Third parties may integrate the Services into their products and services, and we are not responsible for this integration. We may link to third-party sites or apps. This Notice does not apply to the privacy practices of these third-party websites or apps. We do not control these third parties. Please read the privacy policies of other websites carefully. We are not responsible for the practices of these third-party products, sites, or apps.

How To Contact Us

To learn more about our privacy practices or this Notice, please contact us at privacy@arlo.com or write to us at Arlo Technologies, Inc. 2200 Faraday Ave., Carlsbad, CA 92008.

Updates

From time to time we may change our Notice. We will notify you of any material changes to our Notice as required by law. We will also post an updated copy on the places where this Notice currently appears. Please check periodically for updates.