

# 1 PRIVACY POLICY

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At DALI, we take your privacy seriously. This Privacy Policy explains how we collect, use, store, and protect your personal data when you visit our website or otherwise interact with us online.

## 1.1 Data Controller Identity

DALI A/S  
DALI Alle 1, DK-9610 Nørager, Denmark  
E-mail: [privacy@dali-speakers.com](mailto:privacy@dali-speakers.com)

## 1.2 Personal data processing

### 1.2.1 What is personal data?

Personal data is any information relating to an identified or identifiable natural person, such as contact information. Product data is considered personal data only where it can be used, directly or indirectly, to identify an individual.

### 1.2.2 General principles for personal data processing by DALI

We follow these principles when processing your personal data:

- We only collect personal data for specified, explicit, and legitimate purposes.
- We do not collect personal data beyond what is necessary to accomplish those purposes, unless otherwise permitted by applicable law.
- We do not use personal data for purposes other than that for which the data was collected, except as stated herein, or with prior consent.
- We only transfer personal data to third parties where permitted under applicable data protection law, as described in this Privacy Policy.
- We maintain technical and organizational measures to protect your personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.
- We do not store personal data longer than necessary to accomplish the purpose for which the data was collected or for which it is further processed, or as is required by law.

### 1.2.3 Personal data to be collected and processed

When you engage with DALI via various channels, including our websites, apps, dealers and customer support, we collect and process your personal data.

Personal data is collected directly from you only when you actively provide it to us, for example by entering and submitting information via our website or when contacting us. DALI does not collect personal data automatically beyond what is described in this Privacy Policy.

Our website is not directed at children under the age of 16, and we do not knowingly collect personal data from children.

DALI does not use automated decision-making or profiling that produces legal or similarly significant effects.

The personal data that we collect, and process is categorized as follows:

- **Contact & identification data**
  - such as your name, e-mail address, physical address (if provided), phone number (if provided), IP address, and in some cases geographic location and language.
- **Technical & usage data**
  - See the **Cookie policy** for further details
- **Business-related data**
  - Invoicing information: such as your personal details as specified above, company name, your delivery information if different from physical address, your order information, such as product name, quantity, product name, date of purchase and dealer information, and currency.

## 1.2.4 Cookies and similar technologies

DALI uses cookies and similar technologies on its website to ensure technical functionality, enhance user experience, analyse website usage, and—where you have given your consent—to support marketing activities.

Cookies may collect information such as technical identifiers, browser and device information, and website usage data. Where required by applicable law, non-essential cookies are used only after you have provided your consent.

You can manage or withdraw your consent to cookies at any time via the cookie settings available on our website.

Further information about the types of cookies we use, their purposes, and how you can manage your cookie preferences is available in our Cookie Policy.

## 1.2.5 How we use your personal data

We only collect and process personal data if at least one of the above-mentioned purposes applies:

- We provide you with customized information on news, events, competitions and similar marketing content related to DALI, its products and products made in collaboration with third parties. Any processing in this regard is based on your consent.
- We provide you with relevant product software updates and make your future purchases easier by remembering your shipping details. Our processing is necessary for the purposes of the legitimate interests pursued by DALI and such processing is not considered to be harmful towards you.

- We provide you with customer service, handle your requests or complaints, and provide you with product warranty support. Our processing is necessary for the performance of a contract, to which you are a party.
- Processing is based on consent, performance of a contract, or legitimate interests, depending on the specific purpose.

Should you choose not to provide us with the requested and necessary personal data in this regard, we might not be able to fully satisfy your request.

## 1.2.6 Where we store and process your personal data

We store and process personal data only where there is a valid legal basis under the GDPR, such as consent, performance of a contract, compliance with legal obligations, or legitimate interests.

If you have subscribed for our newsletter(s), we store your personal data in our CRM system. If you are one of our partners, we also store your information in our CRM systems.

In case of transfer of your personal data to any other countries, as defined in General Data Protection Regulation (GDPR), valid law and regulations concerning such transfers are observed and relevant legal and security safeguards are ensured before such transfer.

## 1.2.7 Our disclosure of your personal data to third parties

As a general principle, DALI processes personal data for the purpose of operating, maintaining, and improving our website, products, and services. We do not sell personal data.

Personal data is disclosed to third parties only where necessary for the purposes described in this Privacy Policy, where required by law, or where you have given your consent.

DALI may disclose personal data where required to do so by applicable law, court order, or a decision by a competent public authority, including for the purposes of law enforcement.

In addition, we may share personal data with the following categories of recipients:

- **IT and hosting providers** , including providers of website hosting, system operation, and security services
- **Analytics and marketing service providers** , where applicable and subject to required consent
- **Professional advisors** , such as legal, audit, or IT security advisors
- **Public authorities** , where disclosure is required under applicable law

Where personal data is disclosed to third parties acting as data processors on behalf of DALI, such processing is governed by written data processing agreements in accordance with GDPR Article 28. These agreements ensure that personal data is processed only on DALI's documented instructions, in compliance with applicable data protection laws, and subject to appropriate technical and organizational security measures.

Where third parties act as independent data controllers, disclosure takes place in accordance with applicable legal requirements and only for the purposes described in this Privacy Policy.

## 1.2.8 Retention of your personal data

Retention periods depend on the purpose of processing, such as customer support, marketing, or legal obligations.

## 1.2.9 Your rights

Under the General Data Protection Regulation (GDPR), you have the following rights in relation to the personal data processed by DALI:

- **Access**
  - You have the right to obtain confirmation as to whether DALI processes personal data about you and, if so, to access that personal data.  
You also have the right to receive the personal data you have provided to DALI in a structured, commonly used, and machine-readable format and, where technically feasible, to transmit that data to another controller.
- **Rectification**
  - You have the right to request correction of inaccurate personal data concerning you and to have incomplete personal data completed.
- **Erasure**
  - You have the right to request the deletion of your personal data where, for example:
    - The personal data is no longer necessary for the purposes for which it was collected or processed.
    - You withdraw your consent and there is no other legal basis for the processing.
    - You object to the processing and there are no overriding legitimate grounds.
    - The personal data has been unlawfully processed.
    - This right applies unless DALI is required or permitted to retain the data under applicable law.
- **Restriction of processing**
  - You have the right to request restriction of processing of your personal data where:
    - The accuracy of the personal data is contested.
    - The processing is unlawful and you oppose erasure.
    - DALI no longer needs the personal data for the purposes of processing, but the data is required by you for the establishment, exercise, or defence of legal claims.
    - You have objected to processing and verification of whether DALI's legitimate grounds override yours is pending.
- **Data portability**
  - Where processing is based on consent or contract and carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have that data transmitted to another controller, where technically feasible.
- **Objection**
  - You have the right to object at any time to the processing of your personal data based on DALI's legitimate interests.

Where personal data is processed for direct marketing purposes, you have the right to object at any time. You may do so by using the unsubscribe link included in marketing communications from DALI.

- **Withdrawal of consent**
  - Where processing is based on your consent, you have the right to withdraw that consent at any time.  
Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal. Following withdrawal, DALI and relevant third parties will cease processing the personal data unless continued processing is permitted or required under applicable law.
- **Right to lodge a complaint**
  - If you have a complaint regarding DALI's processing of your personal data, you may contact DALI using the contact details provided above.
  - You also have the right to lodge a complaint directly with the competent supervisory authority. In Denmark, this is:
  - **Datatilsynet**, Borgergade 28, 5. DK-1300 Copenhagen, Denmark, E-mail: dt@datatilsynet.dk

## **1.2.10 Third-party websites and services**

Our website may contain links to third-party websites, plug-ins, or services, such as social media features or integrations provided by third parties. If you choose to use such third-party websites or services, you may disclose personal data directly to those third parties.

DALI does not control and is not responsible for the content, security, or privacy practices of third-party websites, plug-ins, or services. The processing of personal data by such third parties is governed by their own privacy policies.

We encourage you to review the privacy and security policies of any third-party websites or services before providing personal data.

## **1.2.11 Webshop and third-party platform**

When you visit or interact with the DALI website, your personal data is processed in accordance with this Privacy Policy.

If you make a purchase or otherwise interact with the DALI Store webshop, additional personal data is processed in connection with order handling, payment, delivery, and customer account management. In these cases, personal data is processed by DALI A/S as data controller, with the webshop being operated using the Shopify platform. Processing of personal data in connection with the DALI Store is therefore also subject to the DALI Store Privacy Policy, which supplements this Privacy Policy and provides more detailed information about webshop-specific processing activities and Shopify's role.

Where personal data is processed by Shopify for its own purposes, Shopify acts as an independent data controller in accordance with its own privacy policy.

### **1.2.12 Data security**

DALI is committed to protecting the security of your personal data. We implement appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

Such measures include, where appropriate, access controls, system security measures, and contractual safeguards with business partners and service providers.

Where access to specific areas of our services is protected by login credentials, you are responsible for maintaining the confidentiality of your username and password and for preventing unauthorized access.

If you have reason to believe that your interaction with DALI is no longer secure, or that personal data may have been compromised, please contact us without undue delay using the contact details provided in this Privacy Policy.

### **1.2.13 Changes to this Privacy Policy**

DALI may update this Privacy Policy from time to time to reflect changes in our products or services, changes in applicable laws or regulatory requirements, or improvements to our data protection practices.

The most recent version of this Privacy Policy will always be available on our website, and the date of the latest update will be indicated at the top of the document.