

Philips Hue

Privacy Notice

Last Updated: April 2021

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At Signify, we take your privacy very seriously.

Signify is the company who develops the Philips Hue products and services under the Philips Hue brands. The use of the Philips brand for Philips Hue products and services is exclusively licensed to Signify by Royal Philips.

Personal data protection is an integral part of the development of all of products and their functionalities. Because successful relationships require mutual trust and shared understanding, we aim for complete transparency in the way that we deal with your personal data. Keep in mind that personal data (in this Notice we may simply call it “data” or “your data”) means any information or set of information from which we are able to either directly or indirectly identify you. For instance, this happens with identifiers such as a name and surname, an email address, and a phone number.

We have drafted this Privacy Notice (which we also call “Notice”) to help you understand who we are, what personal data we collect, why we collect it, what we do with it, what privacy rights and choices you have and how to reach out to us for questions.

We strongly encourage you to take some time to read this Notice in full. If you do not agree to this Privacy Notice, please do not provide us with your personal data.



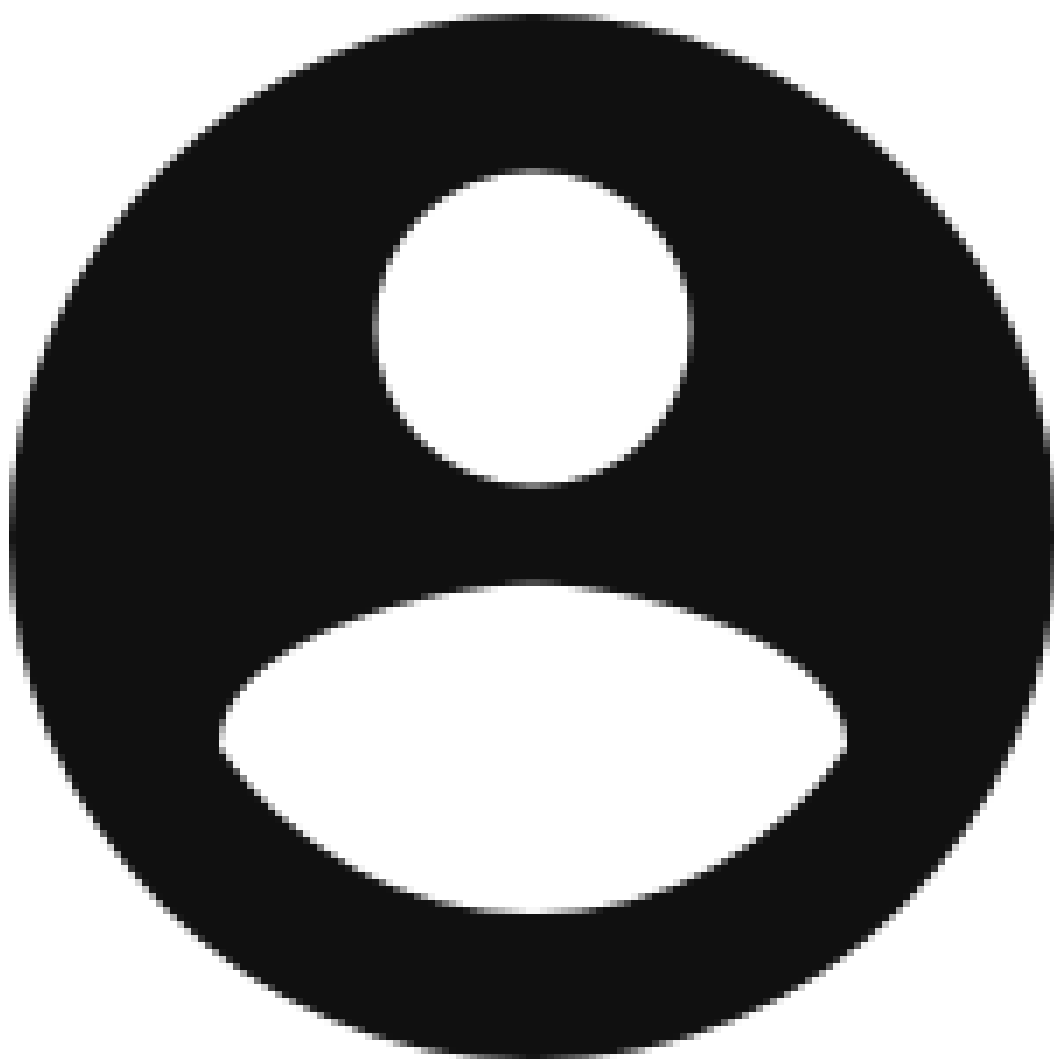
This privacy notice covers our **Philips Hue system, our ecosystem informs you on what personal data we collect** when you interact with us. For example, this occurs when you give data to us, when registering an account, or purchasing a product directly through our web shop. Find out what data sources we use, for which purpose and what type of personal data is processed.



We use **cookies** and other tracking technologies. More details on when and how we use them and how you can control your preferences, you can read in our [Cookie Notice](#) or find out below.



Our service, websites and mobile applications are designed and intended for use by adults. Find out which **legal basis for processing your data** we may use and how we protect children.



What are your responsibilities? We encourage you to take control of your personal data and find out what choices you have at your disposal. For questions regarding this notice as well as other questions related to your personal data or privacy rights, please [contact us](#).

We may use your personal data **to provide you with the best experience possible**, from the moment you explore using a Philips Hue product, by improving our products based upon your feedback, providing consumer support and personalized marketing. Find out how we use your personal data.

How long do **we keep your personal data**? Find out how long we keep your data and what criteria we use to determine the retention periods.

How do **we secure your personal data**? Find out what measures we take in order to ensure your data is secure.

We do not sell or rent your personal data. We share your personal data only in certain circumstances. Find out more.

When we transfer your personal data **abroad**, we protect your data with a variety of technical, organizational and legal measures. [Click here to found out more.](#)

Find out **who we are** and who we mean with 'we'.

We update this Privacy Notice when necessary to reflect changes in our products or their functionality. If changes are significant or have consequences for your rights under this Privacy Notice, we will provide you with more information and maintain prior versions for your reference. Previous versions of our Privacy Notice can be found in the archive.

This privacy notice covers our **Philips Hue system, our ecosystem informs you on what personal data we collect** when you interact with us. For example, this occurs when you give data to us, when registering an account, or purchasing a product directly through our web shop. Find out what data sources we use, for which purpose and what type of personal data is processed.

WHEN DOES THIS PRIVACY NOTICE APPLY?

Philips Hue is not just a smart bulb. It is a smart lighting ecosystem. The Philips Hue system consists of different parts and functionalities which require different types of personal data processing.

This Privacy Notice covers our Philips Hue system. For example, it covers the following:

- when you visit or use our websites, applications or social media channels;
- when you create an account with us;
- when you purchase our products directly from our Philips Hue web shop;
- when you use our Philips Hue products, their functionalities or applications;
- when you subscribe to our newsletters, promotions or other marketing initiatives;
- when you contact or interact with our consumer care team; or
- when you otherwise interact with us or our system.

If you do not fall within the scope of this Privacy Notice for Philips Hue, your personal data will be governed by a different privacy notice. Where additional privacy terms or notices are applicable, we encourage you to read them. You can check our privacy notices in our [Signify Privacy Centre](#).

WHAT TYPES OF DATA DO WE COLLECT ABOUT YOU?

Depending on how you interact with us (e.g. online, offline, over the phone, etc.) and what products you purchase from us, or how you use them, we do process different data about you.

Some data processing is necessary for our products to work as intended or in order to provide you with certain product functionalities. If you choose not to share this data with us, we will not be able to provide you with the full functionality of our products, system or applications. For example, if you choose not to provide location permissions in your phone for our mobile application, our application will not be able to know when you are arriving home and therefore the home and away routines you configure - which depend on our mobile application understanding where you are located - will not work.

We also process your personal data if you voluntarily share it with us. This type of data will provide you with more personalized experiences. For example, the names you give to your Philips Hue products.

Below you will find an overview of the general categories of data that we collect depending upon your use of our products, system or applications:

Data Source	Purpose of processing	Examples of Data Processed
Philips Hue Account Data	If you create an account with us, we will process your data	If you sign up directly with us, the data processed can include your full

in order to create and maintain it.

name, email address, password, country and language.

In case you decide to utilize the third-party sign in options to create the account, we can receive certain additional profile information such as your email address and account name.

If you connect a product, this will form part of your Philips Hue Account.

Purchase Data

If you purchase a product directly from our web shop, we will use your personal data to fulfil your purchase.

Please note that for our web shops, a third party is providing the payment processing functionalities, we do not store credit card details nor do we manage any other part of the payment processing such as fraud checking; a third-party does this. We obtain limited information from this third-party such as the last four digits of the credit card or if the payment was successful or not. The processing of such data is covered by the privacy notice of Luzern Technology Solutions Limited, which may be viewed here: <https://luzern.co/privacy-policy/>.

When you purchase a product directly from us, we can collect the following personal data:

- Order information such as contact details, shipment and invoice address; invoice history.
 - Details of your purchased product.
 - Payment status (of the payment was successful or not).
 - Delivery information and if applicable return or exchange information.
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Consumer Care Data

We use personal data to provide you with consumer support, respond to your inquiries, fulfil your requests, and provide you with related consumer service. We may also use this personal data to improve and customize our products and their functionalities and to train our consumer care employees.

When you contact our consumer support, or when you communicate with one of our consumer care representatives by email, phone, social media channels or similar, we will process the following Personal Data:

- your call recording if you have provided your consent, when required.
- your questions or requests that you addressed.
- the status of the request.
- any data sources available to us if these are necessary to provide the consumer support.

Cookies and similar tracking technologies Data.

We utilize this data in order to provide the requested functionalities, for security purposes, where applicable to improve our ecosystem, for personalization, and for our marketing efforts.

The data being processed depends on the choices you have made.

In general, we might process the following information:

- user unique ID (stored in a cookie for tracking and may be stored on our servers),
- IP address, referring URL, browser, operating system cookie information,
- CSS animations and dynamic content,
- visitors' clicks/touches on elements, changes to input field (like text fields, CSS selector or timestamp),

- elements and session meta-data, input on fields, system errors, window size and changes to size, mouse position, page snapshot, whether a user clicked on an email link, and other events. Such information may identify you.

We do not record any keystrokes.

Usage Data relating to our products and their functionalities

We utilize this data in order to provide the requested functionalities and where applicable to improve or develop our products and new technologies via analytics, for personalization of our product functionalities, and for our marketing efforts.

- Device information,
- log information,
- location information - to the extent this is strictly necessary for us to provide you with the requested use of our services. This is necessary in our Philips Hue application for instance to allow your lights to be properly triggered through certain routines you choose to set up, such as triggers relating to the time of sunrise and sunset at your location or when you come home or leave your home. Location data provided by your device using these services will remain in your device and in the Philips Hue Bridge. With regards to our Philips Hue Bluetooth application, location data is provided through your operating system because this is a requirement when enabling the Bluetooth connection to your lights. Your location data will not be shared with us.
- other information about your use of our products, other information about your setup.

Online

We use this personal data to

When you use this functionality, we

Feedback Data	provide other users with insights into the value of our propositions.	will process the following personal data: <ul style="list-style-type: none">· Your comment and review;· Your identity (if provided).
Online sweepstakes and competitions Data	We use this personal data in order to allow you to register in the competition, to avoid fraud, to fulfil the prize, and for marketing communications in case you have consented to these.	If you choose to participate in our competitions, depending on your choices we collect the following personal data: <ul style="list-style-type: none">· Name, Email address, Phone Number, Postal Address, Date of birth, other information as necessary or as required by the competition's terms.
Social listening Data	We use this personal data to obtain an overall view of people's perceptions of us and our brand, and to resolve problems regarding our products and product functionalities.	<p>When you interact or communicate on social media in a public manner, your Personal Data is processed by a third party that provides social listening services to us.</p> <p>The Personal Data collected include, depending on what you choose to make public, information such as: name, birthday or age, interests, and comments and content you have posted/shared.</p>
User Generated Content	If you have agreed to it, we might use content you have published online (such as pictures or videos you might have taken which contain Philips Hue products) in order to showcase them to the public in any of our channels.	<p>The personal data processed depends on the information that you have made public. The Personal Data collected might include information such as: username, and comments or content you have posted.</p> <p>Please remember that the content you have agreed to provide to us can be viewed by the public, and, as such,</p>

before agreeing, you should review if you are comfortable sharing any personal data that might be visible.

User interactions

If you modify your account settings, usernames or marketing consent status, these events will be recorded by our backend systems.

The backend systems will collect information which can be considered to be personal information including:

- The change request;
- The timestamp of that request.

Contact Forms

If you submit a contact form or sign up for our newsletters or marketing offerings, we will process certain personal data about you.

The personal data that you submit will be processed in order to fulfil the purpose for which it was collected. In general, we might collect following personal information:

- Full Name
- Email Address
- Consent status and timestamp

Third-party Data

In addition to our websites, applications and other digital channels, we may also obtain information about you from other sources, such as social media platforms, joint marketing partners or more generally providers of products and product functionalities complimenting the Philips Hue ecosystem such as voice assistant providers.

The data being processed is highly dependent on your choices and which third-parties are involved. If you would like to receive specific information in this regard, please [contact us](#).

For example, if you are controlling Philips Hue

products by using a voice-enabled product (such as Amazon Alexa, Apple Siri, Google) you are prompted to allow such devices to connect with the Philips Hue system. Once this functionality is enabled, we may collect and process functional data (such as registration data, usage and diagnostic information) and your usage thereof. We do not receive or process the audio.

Philips Hue Account Data	+
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Purchase Data	+
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Consumer Care Data	+
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Cookies and similar tracking technologies Data.	+
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Usage Data relating to our products and their functionalities	+
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Online Feedback Data	+
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Online sweepstakes and competitions Data	+
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Social listening Data	+
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User Generated Content	+
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User interactions

+

Contact Forms

+

Third-party Data

+

We use cookies and other tracking technologies. More details on when and how we use them and how you can control your preferences, you can read in our [Cookie Notice](#) or find out below.

Cookie is a generic name for a small text file which attaches an identifier to a user. A cookie may collect personal data.

For more information on how we use cookies and other tracking technologies, read our [Cookie Notice](#) (which can be found on the website of the [Signify Privacy Center](#), see “Legal information” section). You can control your cookie settings via the cookie preference choices

Our service, websites and mobile applications are designed and intended for use by adults. Find out which **legal basis for processing your data** we may use and how we protect children.

ON WHAT LEGAL BASIS DO WE USE YOUR DATA?

- **Consent.** If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time.
- **Contractual relationship.** The necessity to establish a contractual relationship with you, to perform our obligations under a contract and to respond to your requests.
- **Legal obligations.** The necessity for us to comply with legal obligations and to establish, exercise, or defend ourselves from legal claims.
- **Legitimate interests.** The necessity to pursue our legitimate interests, including:
 - to ensure that our networks and information are secure;
 - to administer and generally conduct business within Signify;
 - to prevent or investigate suspected or actual violations of law, breaches of a business customer contract, or non-compliance with the Signify Integrity code or other Signify policies;
 - to optimize or extend our reach and the relevance of our communications.
- **Protection of the vital interests of any person.**
- **Any other legal basis anyhow permitted by local laws.**

DO WE COLLECT DATA FROM CHILDREN?

Our websites and mobile applications are designed and intended for use by adults. We do not intentionally collect information from children under the age of 16.

- **Special note to Children under the age of 16:** if you are under the age of 16, we request you not to share your data with us unless you have explicit consent from your parent or guardian before sharing your data with us. Upon request you will be required to proof this received prior consent;
- **Special note to Parents of Children under the age of 16:** we recommend you to check and monitor your children's use of our products, systems, product functionalities, applications (including websites and other digital channels) in order to make sure that your child does not share personal data with us without asking your permission.

What are your responsibilities? We encourage you to take control of your personal data and find out what choices you have at your disposal. For questions regarding this notice as well as other questions related to your personal data or privacy rights, please [contact us](#).

WHAT ARE YOUR RESPONSIBILITIES?

We would like to remind you that it is your responsibility to ensure, to the best of your knowledge, that the data you provide us with, are accurate, complete and up-to-date. Furthermore, if you share with us data of other people, it is your responsibility to collect such data in compliance with local legal requirements. For instance, you should inform such other people, whose data you provide to us, about the content of this Notice and obtain their prior consent.

If you decide to sell or share our products with others, please note that certain products might store locally personal data relating to you or your use of the product. In such cases, if you intend to share, return, or sell the device, please make sure:

- In case you give access to third parties to your Hue bridge or Hue Sync box, you are comfortable with these third parties being able to access the personal information contained within our products;
- In case you wish to return or sell your device please make sure you perform a factory reset of the product in question. The instructions on how to perform this factory reset are present in the product manual or on our website (Hue support); and

In any case, where you provide us with personal data of any other individual as part of your usage, you have obtained consent from that individual prior to providing the information to us.

WHAT ARE YOUR CHOICES?

We aim to provide you with access to your data. Usually, you can autonomously control your data (e.g. by logging in to your account) and update, modify or, in some cases, delete it. In this case, we strongly encourage you to take control of your data. You may exercise certain rights regarding your data processed by us. In particular, you have the right to:

Withdraw your consent at any time. You have the right to withdraw consent where you have previously given your consent to the processing of your data.

Object to processing. You have the right to object to the processing of your data if the processing is carried out on a legal basis other than consent.

Access your data. You have the right to learn if your data is being processed by us, obtain disclosure regarding certain aspects of the processing and obtain a copy of your data undergoing processing.

Verify and seek rectification. You have the right to verify the accuracy of your data and ask for it to be updated or corrected.

Restrict the processing. You have the right, under certain circumstances, to restrict the processing of your data. In this case, we will not process your data for any purpose other than storing it.

Request to delete your data. You have the right, under certain circumstances, to obtain the erasure of your data from us.

Receive and transferred to another controller. You have the right to receive your data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that your data is processed by automated means and that the processing is based on your consent, on a contract which you are part of or on pre-contractual obligations thereof.

Lodge a complaint. You have the right to bring a claim before your competent data protection authority.

For any questions or reasonable inquiry related to the protection of your data by us or regarding this Notice in general, you can contact the Signify Privacy Office:

- Mail: Signify - Attn: Privacy Office – Herikerbergweg 102, 1101CM Amsterdam Zuid Oost, The Netherlands; or
- Online: [Signify Privacy Center](#), “Privacy request” section.

Please keep in mind that email communications are not always secure. Therefore, please do not include sensitive information in your emails to us.

We will do our best to address your request in time and free of charge, except where it would require a disproportionate effort. In certain cases, we may ask you to verify your identity before we can act on your request. If you are unsatisfied with the reply received, you may then refer your complaint to the relevant regulator in your jurisdiction.

We may use your personal data **to provide you with the best experience possible**, from the moment you explore using a Philips Hue product, by improving our products based upon your feedback, providing consumer support and personalized marketing. Find out how we use your personal data.

HOW DO WE USE YOUR DATA?

As shown above, we may collect your data from a variety of sources. Below you will find an overview of the general purposes for which we may use your data:

Purposes

Examples

Conclusion and execution of agreements	<ul style="list-style-type: none">· Sales, billing, shipment of products, or warranty;· registration to mobile applications or websites;· offering of product and product functionalities· service or transactional communications.
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Providing support (upon your request)	Providing support via communication channels, such as consumer care . You might be able to call, chat, or send us messages via social networks. We advise you to only share your personal data privately with us. We will do our utmost best to respond as soon as we can via the same or another suitable communication medium.
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Personalized Communication	Personalized email, messages and other digital channels, such as mobile applications and social media. This includes certain market surveys.
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Product and product functionality Personalization	Personalizing our products and their functionalities by tailoring them to your preferences and interests (such as on our sites or applications).
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Compliance with legal obligations	Disclosing data to government institutions or supervisory authorities as applicable in all countries in which we operate, such as tax and national insurance deductions, record-keeping and reporting obligations, conducting compliance audits, compliance with government inspections and other
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requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, and managing any internal complaints or claims.

Defense of legal claims

Establishment, exercise or defense of legal claims to which we are or may be subject

Product development

To improve the products, product functionality, or mobile applications and develop new technologies or functionalities. This includes certain market surveys.

HOW DO WE USE YOUR DATA FOR PERSONALIZED COMMUNICATION, MARKETING AND PRODUCT PERSONALIZATION?

We might use your data for personalized communications, marketing and product personalization. In essence, we strive to make our products and their functionalities contextualized in order for them to respond to your preferences and needs. In essence, we are leveraging the data we have in order to provide smarter and more enriching experiences.

We might personalize our communications and other product functionalities based on the data we have available. This will allow us to personalize our communications to you and display relevant information and offers from Philips Hue on our websites, mobile applications and via third-party websites.

As an example, if we know that you have recently purchased a Bluetooth Philips Hue bulb, we might send you personalized marketing communications with information regarding the benefits of adding a bridge to your ecosystem. In our mobile applications, we might include personalization elements so that, if we know that you have tried to pair a bulb with the bridge but encountered a problem, we can provide you with contextualized FAQ's which will help you solve this matter quickly.

If you do not feel comfortable with this, you can at any time either unsubscribe from our personalized marketing communications or opt-out from personalization through your Philips Hue application settings or via the cookie preference settings.

Our marketing communications:

With your prior consent or when permitted by applicable law, we may send you regular personalized direct marketing communications about our products, services, events and promotions.

Although we mostly engage in email communications, we may contact you via different channels such as: email, website, mobile applications or third parties such as social media or other publishers.

Additionally, and if you provided consent for this or when permitted by applicable law, we may contact you to provide information regarding Friends of Hue products and such other products and product functionalities complementing the Philips Hue ecosystem.

If at any moment you decide that you no longer want to receive these communications, you can always unsubscribe. To unsubscribe, you can always click on the unsubscribe button located at the end of every marketing communication we send or adjust your preferences within the channel you are using. Additionally, you can always **contact us** and we will do this for you.

Please note that even if you opt out from receiving marketing communications, you might still receive administrative, service or transactional communications from us, such as technical and/or security updates of our products, order confirmations, notifications about your account activities, and other important notices. You cannot unsubscribe from these types of communications.

How long do **we keep your personal data**? Find out how long we keep your data and what criteria we use to determine the retention periods.

HOW LONG DO WE KEEP YOUR DATA?

We keep your data for the period necessary to fulfill the purposes for which it has been collected (for details on these purposes, see above section “How do we use your data?”). Please keep in mind that in certain cases a longer retention period may be required or permitted by law. The criteria used to determine our retention periods include:

- How long is the data needed to provide you with our products or product functionalities or to operate our business?

- Do you have an account with us? In this case, we will keep your data while your account is active or for as long as needed to provide the product functionalitiesto you.
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation, protection against a possible claim, or tax purposes.

Your data processed to continue to improve your experience with us is retained for as little time as possible, after which we anonymize or delete it, when there is no longer a consumer, legal or business need for your data to be retained.

We design our systems with data security in mind by using appropriate technical and organizational measures. Privacy by design and privacy by default are our guiding design elements.

HOW DO WE SECURE YOUR DATA?

To protect your data, we will take appropriate measures that are consistent with applicable data protection and data security laws and regulations, including requiring our service providers to use appropriate measures to protect the confidentiality and security of your data. . More information on our security by design approach can be found [here](#). If you have reason to think that your interaction with us or your Data is no longer processed in a secure manner, please reach out to the [Signify Privacy Office](#) immediately in accordance with “What are your choices?” as described below.

We do not sell or rent your personal data. We share your personal data only when required to by law, if you provide us with permission, or to other parties acting on our behalf.

WHEN DO WE SHARE YOUR DATA?

We never sell or rent out your personal data. We also do not share your personal data except in the limited cases described below and on a strict need-to-know basis. If it is necessary for the fulfillment of the purposes described in this Notice, we may disclose your data to the following entities:

- Signify affiliates: due to our global nature, your data may be shared with certain Signify affiliates. Access to your data within Signify will be granted on a need-to-know basis;

- Service providers and business partners: like many businesses, we may outsource certain activities to trusted third party service providers to perform functions and provide services to us, such as ICT service providers, consulting providers, shipping providers, payment providers, electronic communication service platforms;
- Public and governmental authorities: when required by law, or as necessary to protect our rights, we may share your data with entities that regulate or have jurisdiction over Signify or its subsidiaries.
- Professional advisors and others: we may share your data with other parties including professional advisors, such as banks, insurance companies, auditors, lawyers, accountants, other professional advisors.
- Other parties in connection with corporate transactions: we may also, from time to time, share your data in the course of corporate transactions, such as during a sale of (part of) a business to another company, or any reorganization, merger, joint venture, or other disposition of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).
- To third-parties in the Philips Hue ecosystem: If you choose to connect your Philips Hue lighting system with products and services of providers complimenting the Philips Hue ecosystem and Friends of Hue, we will share with them limited account and profile information. These third-party services are offered by independent data controllers and its use of your personal data is subject to their respective privacy policies. You should carefully review their policies to determine how they will treat your data.
- Upon your privacy request in case of a personal data portability request.

When we transfer your personal data abroad, we protect your data with a variety of technical, organizational and legal measures.

WHEN DO WE TRANSFER YOUR DATA ABROAD?

Signify has a global approach to the protection of privacy and to allow internal data transfers between Signify companies worldwide, Signify benefits from adopted Binding Corporate Rules (“Privacy Rules”). You can find more information on our Privacy Rules on Signify privacy website (www.signify.com/global/privacy). Due to our global nature, data you provide to us may be transferred to or accessed by Signify affiliates and trusted third parties from many countries around the world for purposes described in this Privacy Notice. As a result, your data may be processed outside the country where you live.

If you are located in a country member of the European Economic Area, we may transfer your data to countries located outside of the European Economic Area. Some of these countries are recognized by the European Commission as providing an adequate level of protection. With regard to transfers from the European Economic Area to other countries that are not recognized by the European Commission as providing an adequate level of protection, we have put in place adequate measures to protect your data, such as organizational and legal measures (e.g. binding corporate rules and approved European Commission standard contractual clauses, or similar frameworks). You may obtain a copy of these measures by contacting the **Signify Privacy Office** (you will find the contact details in the below section “what are your choices?”).

WHO ARE WE?

Signify is the company who develops the Philips Hue products and services under the Philips Hue brands. The use of the Philips brand for Philips Hue products and services is exclusively licensed to Signify by Royal Philips.

Signify is a global lighting organization with recognized expertise in the development, manufacturing and application of innovative lighting products, systems and services.

When this Notice mentions “we,” or “us,” it refers to the Data Controller under this Notice, namely the Signify affiliate with which you had, have or will have a relationship or that otherwise decides which of your data are collected and how they are used, as well as Signify Netherlands B.V. (Registration number 17061150 - High Tech Campus 48, 5656 AE, Eindhoven, The Netherlands). Please note that the Signify affiliates include the subsidiary companies in which Signify N.V. has control, either through direct or indirect ownership. You may obtain a list of Signify affiliates by contacting the Signify Privacy Office.

We update this Privacy Notice when necessary to reflect changes in our products and their functionalities. If changes are significant or have consequences for your rights under this Privacy Notice, we will provide you with more information and maintain prior versions for your reference.

UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice might change from time to time.

The most recent version of this Notice will govern our processing of your data and can be found on the Philips Hue website. Our Privacy Notice archive will keep prior versions of this Privacy Notice for your reference.

- Signify -

Version history

Date

2021-1

[View >](#)

2021

[View >](#)

2019

[View >](#)

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