

# Privacy policy

Our confidentiality policy has been drafted in order to explain with total transparency how we process your personal data.

Withings Inc. is located at 101 Main Street, Floor 14, Cambridge, Massachusetts, 02142, United States of America. (USA)

**If you do not find the answer to your questions in this document, feel free to contact us though this email: [privacy@withings.com](mailto:privacy@withings.com)**

## 1. Which data are collected?

The use of Withings' products and services request data to be collected. Those data identifies you either directly or indirectly.

Data that identifies you directly may be your first name or surname, your date of birth, your e-mail address, your photo, etc. We may also collect data that identify you indirectly such as your weight, your postcode, etc.

The protection of your data is at the heart of our confidentiality policy and we undertake to preserve them by applying the optimum level of security.

## 2. Which means are at your disposal to keep control of your personal data?

We believe that you should always have the means to protect your privacy when you use connected objects. At Withings we consider that we should support you and protect your privacy as fully as possible by guaranteeing you the following rights:

### - Right to access your data

Your personal data is and shall remain easily accessible. This means that you can always export your personal data in an open format for you to easily keep and access to them.

### - Right to amend your data

At any time you may amend, add to, delete or update the personal data produced by an active measurement on your part. This may be done directly in the application or [on request](#).

## - Right to object to your data being processed

You may for legitimate reasons object to your personal data being processed by contacting our [customer service department](#). However, be aware that this action might limit the scope of Withings' products and services.

## - Right to protect your data

At Withings, we use various methods to safeguard your data [How do we protect your data?]. First, you need to have a password-protected account to access your data.

To strengthen this security, we have developed a feature that allows you to have an additional level of safety: in our mobile application you can define a second password or, when it is possible, you can choose to use your fingerprint (stored only on your phone - we do not have access to it).

## - Right to control your data sharing

We have designed and developed a dashboard that shows you clearly with whom you have shared your data. This tool has been conceived to allow you to control and stop the sharing of your data with [our partners](#) or with [other users](#).

## - Right to be forgotten: deletion of your account

At Withings we give you the right to remove data that identifies you directly by deleting your account [How do I delete my Withings account?].

### 3. How to identify data collected?

Transparency and easy access are key factors for us. We have created this list of pictograms so that you can easily identify what is processed.



Identity data



Body metrics data



Activity data



Environmental data



Cookies – technical features

### 4. Which data are collected and when?

Withings' objects and services collect data when you use them. We decided to list and explain you in details different scenarios in order for you to have a clear understanding of the means of data collections we use.

You therefore transmit data to us:

- **When you visit and use our websites and services**
- **When you create a Withings account**
- **When you use our applications**
- **When you activate and use a Withings product**
- **When you log on to your Withings account with a partner**
- **When you contact our customer service department**

- **When you visit and use our websites and services**

We collect certain data when you use our website or when you take part in our events or reply to our questionnaires. Certain information are collected even if you do not have a Withings account. This may happen when you view pages, take part in surveys, competitions or events, write a comment on our website, share a page on a social network, order a product, etc.

When you order a product on our website, we have to retain certain data relating to your order, such as your delivery and billing address, even if you choose the option allowing you to order without creating an account. However, Withings will never have access or store your bank details since payments transactions are conducted and secured by our partners.

We also use cookies on our website. For further information on them, you can refer to our [Policy relating to Cookies](#).

Here is the data that you may communicate to us by visiting and using our sites and services:



Identity data



Cookies – technical features

- **When you create a Withings account**

Creating a Withings account allows you to use Withings' services and applications. You will therefore need to provide us with certain data to identify yourself. Your Withings account is the core component of our services. It allows you to access and control your personal data. Data are collected and used during account and/or user profile creation, when logging on to your account, ordering a product from your account, adding a photography, etc.

Here is the data that you may communicate to us in creating a Withings :



Identity data

- **When you use our applications**

Using our applications requires an account. Through applications, you can use Withings products and services, interact with them and access all features offered by Withings.

To that end, certain data are communicated to us when you download, install and use features of the application. This is the case when you set an alarm, share information, measure steps, respond to questionnaires or fulfill a field in the application, etc. It is also through the application that your data is communicated to us when you install and synchronize your Withings product.

Through the application you may activate certain optional features such as geolocation through your telephone.

**We never save your contacts:** the application accesses them to facilitate sharing but no data is accessible to us. Even when you challenge a friend, we do not retain this friend's data. We shall only use their information to send them your request.

Here is the data that you may communicate to us by using our applications:



Identity data



Body metrics data



Activity data



Cookies – technical features

#### - When you activate and use a Withings product

Withings' products, services and applications collect data, enabling monitoring by their accumulation. When you activate a Withings product, you will be asked to download the Withings application and create an account. Certain features are only accessible by means of a connection between your product and the application.

Your data are transmitted to our servers when you synchronize your product with our applications or when you connect your product to your Wi-Fi network.

Here is the data that you may communicate to us by using our applications:



Identity data



Cookies – technical features



Activity data



Environmental data

#### - When you connect your Withings account to a partner

Our partners may offer to share your data with theirs. This is done via our [API](#) exchange system, which we designed as open and free of charge. With your prior agreement, we may have to receive certain data that you had previously communicated to the partner.

Here is the data that you may communicate to us in connecting your Withings account to a partner:



Identity data



Body metrics data



Activity data



Environmental data

## - When you contact our customer service department

When you contact our [customer service department](#), you provide us with information that allows us to identify you. The information transmitted remains confidential when you contact us through our website.

For the purposes of responding to your support request, some of your data may be temporarily communicated to our teams until the problem is solved. We ensure that our teams comply strictly with our confidentiality policy.

Here is the data that you may communicate to us by contacting our customer service department:



Identity data



Body metrics data



Activity data



Environmental data



Cookies – technical features

## 5. How your data might be used?

- To present your data to you and to offer you innovative services

The data produced are displayed through our applications. Data may be indicated as raw data (number of steps, weight, etc.), or after processing (heart rate, respiration, movement which produces your sleep patterns, etc.). Some function or services you may want to use do request specific data processing. As an example, when programming your **Smart Wake-up**, we may use the data recorded during the night to adapt the timing of your wake-up program to your personal body clock.

- To improve Withings' products and services

In order to improve our products and services and ensure the availability of our platform, in accordance with Internet standards, we retain a record of operations conducted in log form.

We never work with your data when it identifies you unless you have given us your consent, for example in order to resolve a problem that you have pointed out to us [When you contact our customer service department].

## - To communicate information to you

We may use certain data in order to offer surveys, competitions, discount coupons or events in which you are free to participate. The same medium shall also be used to provide you information on our products, such as new features, sales offers from Withings or our partners, or to announce new products.

If you do not wish to receive such information, please follow [this link](#) and deactivate notifications that you do not want to receive.

## - To produce statistics and aggregated data analyses

**We undertake not to sell your personal data without your prior agreement.** At Withings, we firmly believe that data can serve the collective interest. We may produce statistics and analyses using collected data. They would first be anonymized and aggregated beforehand to assure your privacy to be protected.

Data anonymized and aggregated in this way are used in particular to:

- **Improve Withings' products and services** in order to:
  - Understand how our products and services are used and can be improved. For example, *This has resulted in the development of a wristband to complement the Pulse;*
  - Improve the user experience of visitors on our websites and applications;
- **Demonstrate the effectiveness of connected objects**
  - We take part in scientific studies: this is the case during connected health studies, for example;
  - We communicate through our blog, advertising or the press, to inform the public about the impact of our products;
- **Make the general public aware of health issues:**
  - On the "[Withings Health Institute](#)" portal we offer the general public analyses carried out based on anonymized data;
  - **We produce websites and interactive charts** to present these statistics and analyses;
  - **We sometimes generate studies, analyses and general statistical studies** for the public or for companies. We may therefore produce studies on connected health and the new uses that it involves (e.g. [white paper on connected health](#)), statistics on the impact of time changes on sleep, etc.;
  - **We wish to continue to inform the public** of the new issues raised by connected objects. This is why we send these statistics and analyses to the press.

## 6. In which cases do you authorize us to share your data?

You may freely share your personal data. However, it is essential for us to gain your prior agreement when data that can identify you are shared.

### - When it is on your own initiative

**You can decide to share your data with our partners:** Our partners may offer to link your data with theirs. This is notably done through our [API](#), which we designed as open and free of charge. Be aware that we cannot guarantee that our partners will implement policies that protects your privacy to the same degree as ours. We recommend you to always check this point before accepting to share your data; this is essential for protecting your personal data.

**You may share your data when challenging your friends:** E.g. when one of your friends uses Withings' products and services, you can challenge him or her to compare your number of steps.

**You may share your personal data on social networks:** You can choose to share your data or webpages that you like through social networks. Sharing is done in accordance with the conditions of use of the social network that you use. We cannot guarantee you the same level of protection provided by our policies when using social network.

**You may share your data through "Withings Challenges":** Withings Challenges are interfaces made available to companies and associations. When a Withings challenge is launched, you will be able to agree to share data with your friends, your colleagues, your company or members of your team. You are given the applicable terms and conditions before you undertake the challenge.

**You may share your dashboard:** You may share your data with the various users registered on your account or with other users of your product or designate another account with which you wish to share your data.

### - When sharing your data is necessary to provide you with certain services

Some services require the involvement of other companies. This is the case for example for online payments on our [www.withings.com](http://www.withings.com) website. In order for this service to work, we have to transmit certain data to our partners that allows you to be identified and process to a secured payment.

### - When we are obliged by law

Certain laws, regulations, administrative or court rulings may compel us to communicate certain personal data to a third party. Apart from where this is prohibited, we shall inform you as soon as possible if we have to transmit some of your data.

## 7. For how long do we retain your personal data?

Apart from where the law stipulates a specific period, we retain your personal data for a period not exceeding the period required for the purposes for which it was collected and processed. We therefore retain your personal data attached to your account until the account deletion.

## 8. Where are your personal data kept?

To guarantee the security of your data, they are stored and processed on our servers. Our servers are located within the European Union (France) and are therefore subject to regulations that guarantee you a high level of protection for your personal data.

However, certain technical constraints (notably the video stream for [Withings Home](#)) dictate that we process certain data closer to you. So, depending on your geographical location, data will thus be stored and processed as follows:

- Europe: Ireland
- North America: United States
- South America: Brazil
- Asia: Japan/Singapore
- Australia: Australia

## 9. What is the minimum age for the use of Withings' services?

You must be over the age of thirteen (13) to create an account and use our products and services.

We must point out that, if you are a minor, your parents or legal guardians (hereafter your "**Parents**") must give us their consent by contacting our [customer service department](#). Our teams will answer any questions that you or your Parents may have concerning the use of our products and services and the rules relating to the collection of personal data.

If we collect data from people under thirteen (13) or a minor who has used our products and services without the consent of their Parents we will delete those data permanently from our servers as soon as we are informed of this.

## 10. How do we protect your data?

Your data are mainly stored on servers located in France [Where are your personal data kept] equipped with the latest security equipment and advanced security techniques and procedures. Access is strictly restricted and various security controls, consisting of security staff, security doors and biometric readers, must be passed. Remote access to the servers is highly restricted and controlled.



## 11. How do I delete my Withings account?

We allow you to suppress your user profile directly from our applications.

To delete your account, you just need to contact our [customer service department](#).

The data which identify you directly will then be deleted from our production servers. However, data may be retained within the security backups that we regularly make. This is why your data may remain on our servers after your request.

In order to ensure free access to your data, we shall give you the option of retaining your data locally before deleting your account. This will be done following a secured procedure.

## 12. Can the confidentiality policy change?

We may change our confidentiality policy to adapt to your needs, to the evolution of the legal framework or when we develop our products and services. We shall inform you of any modification performed.