

# COLLECTIVE PRIVACY STATEMENT

This Privacy Statement describes how Seagate Technology LLC or an affiliate controlled by, under common control with, or controlling Seagate Technology LLC, including but not limited to affiliates operating under the LaCie name or brand (“**Company**” or “**we**” or “**us**”) collects, uses, and shares information through our Collective website, currently located at <http://collective.lacie.com> (the “**Site**”).

## PERSONAL INFORMATION

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual, including but not limited to:

- Name
- Site user name
- Postal address
- Telephone number
- Email address
- Profile picture
- Social media account ID
- IP Address

We collect and process these types of Personal Information to provide our services to you and as legally required. If you do not provide the information that we request, we may not be able to provide you with the full experiences of this Site and its services.

## Collection of Personal Information

We collect Personal Information in a variety of ways, including:

- **Through the Site.**
  - We collect Personal Information through the Site, e.g., when you register for a Site account.
- **From Social Media Platforms and Other Sources.**
  - Consistent with your choices, we receive your Personal Information from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties. In addition, if you elect to connect your social media account to your Collective account, certain Personal Information from your social media account will be shared with us, which may include Personal Information that is part of your public profile or your friends’ public profiles.
- **Through Messaging Functionality.**
  - Depending on the type of account you have with the Site, the Site provides functionality that allows you to send a message to another user of the Site through an account you maintain with a third-party social media or messaging platform (e.g., Facebook). If you send or receive messages through this functionality on the Site, our Site will receive and retain a copy of these messages.

Please be aware if you disclose any Personal Information relating to other people to us or to our service providers in connection with the Site, you represent that you have the permission to do so and to permit us to use the information in accordance with this Privacy Statement.

## Use of Personal Information

We use Personal Information:

- **To provide the functionality of the Sites and its services and to fulfill your requests.**
  - To respond to your inquiries, fulfill your requests and provide you with related support.
  - To send administrative information to you, such as changes to our terms, conditions and policies.
  - To determine the appropriate language for your site experience.

We engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.

- **To provide you with marketing materials and to personalize your experience on the Site.**
  - To send marketing communications that we believe may be of interest with your consent.
  - To personalize your experience on the Site by presenting products and offers tailored to you, and to facilitate social sharing functionality.

We engage in these activities either with your consent or for our legitimate business interests.

- **To allow you to participate in sweepstakes and other promotions.**
  - To allow you to participate in sweepstakes, contests and similar promotions and to administer these activities. Some of

these activities have additional rules containing information about how we use and disclose your Personal Information. We engage in these activities either with your consent or to manage our contractual relationship with you.

- **To accomplish our business purposes and analyze information.**

- To aggregate and/or anonymize Personal Information.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving or modifying our Site, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- To use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Site. We can also derive your approximate location from your IP address.

We engage in these activities either to manage our contractual relationship with you, to comply with a legal obligation and/or based on our legitimate business interests.

#### **Disclosure of Personal Information**

We disclose Personal Information:

- To our affiliates for the purposes described in this Privacy Statement.
- To our third party service providers who provide services such as website hosting, data analysis, information technology and related infrastructure provision, customer service, email delivery, auditing and other services.
- To third-party sponsors of sweepstakes, contests and similar promotions.
- By you, through your Site profile and other information or content you may post or disclose through the Site, or through your social media account.
  - Please note that any information you post or disclose through the Site will become public and available to other users and the general public.
  - To your friends associated with your social media account(s), to other website users and to your social media account provider(s), in connection with your social sharing activities. By connecting your Site account and your social media account(s), you authorize us to share information with your social media account provider(s), and you understand that the use of the information we share will be governed by each social media provider's privacy statement.

#### **Other Uses and Disclosures**

We also use and disclose your Personal Information as we believe to be necessary or appropriate:

- To comply with applicable law and regulations.
  - This may include laws and regulations outside your country of residence.
- To respond to requests from public and government authorities or to cooperate with law enforcement.
  - This may include authorities outside your country of residence.
- For other legal reasons.
  - For example, to enforce our Terms of Service or other agreements with you; and
  - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- In connection with a sale or business transaction.
  - We have a legitimate interest to use, disclose or transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

#### **OTHER INFORMATION**

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual.

- Browser and device information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you that does not reveal your specific identity
- Information that has been aggregated in a manner that it no longer reveals your specific identity

#### **Collection of Other Information**

We and our service providers collect Other Information in a variety of ways, including:

- **Through the Site.**
  - Through your account settings, you have the option to provide us with your time zone, nominated location, choice of profile color, interests, profession, etc.
- **Through your browser or device.**
  - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version you are using. We use this information to ensure

that the Site functions properly.

- **Using cookies and similar technologies:**

- When you visit the Site, we collect information automatically through your browser or device, through your use of the Site, or using cookies and similar technologies. Please refer to our [Cookie Statement](#) for additional information about these practices.

- **Google ReCaptcha.**

- We also use a Google-provided tool called "reCAPTCHA" which, on some form submissions, is intended to tell humans from robots to prevent abuse of those forms by spam bots. The reCAPTCHA tool may, in its algorithm, make use of cookies as well as other information like IP address, date, time, language, screen size and resolution, and mouse movements while on the page. The reCAPTCHA tool is subject to Google's [terms of use](#) and [privacy policy](#).

## **Uses and Disclosures of Other Information**

In some instances, we combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

## **THIRD PARTY SERVICES**

This Privacy Statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Site links. The inclusion of a link on the Site does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of any third party social media platform provider or other organization, including with respect to any Personal Information you disclose to other organizations through or in connection with the Site, such as by using third-party messaging services linked or integrated through the Site.

## **SECURITY**

We have reasonable security measures in place to protect against the loss, misuse and alteration of the information under our control. Please be advised, however, that while we strive to protect your information, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your information. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact Us" section below.

## **CHOICES AND ACCESS**

### **Your choices regarding our use and disclosure of your Personal Information**

You may opt-out from:

- **Receiving electronic communications from us:** If you no longer want to receive marketing-related emails from us, you may opt-out by either notifying us in accordance with the "Contact Us" section below or by clicking on the "Unsubscribe" link found in our marketing emails.

We will comply with your request(s) within thirty (30) days or as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages.

### **How you can access, change or remove your Personal Information**

If you would like to request to access, correct, update, or delete your Personal Information, or if you would like to request to receive an electronic copy of Personal Information that you have previously provided to us for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may send us your request as described in the "Contact Us" section below. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information removed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we will only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request within thirty (30) days or as soon as reasonably practicable.

Please note that we need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

## **RETENTION PERIOD**

We will retain your Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained.

The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you and provide the Site to you; (ii) whether there is a legal or business obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations regulatory investigations, or other legal matters).

## **USE OF SITE BY MINORS**

This Site is not directed toward minors or other individuals that are not of legal age within their given jurisdiction. We do not knowingly collect Personal Information from minors.

## JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers. Please be aware that, when you use the Site, we transfer information, through the course of regular business operations, to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your Personal Information. You may obtain a copy of these measures by contacting us as described in the "Contact Us" section below.

## SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, financial information, credit card numbers, username and password information) on or through the Site or otherwise to us. Please be aware that if the content you provide to the Site for publication includes special categories of information (such as information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership), this sensitive information becomes publicly available.

## UPDATES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement from time to time. If so, we will post our updated Privacy Statement on our Site along with a change notice on the Site prior to the change. We may also send registered users of our Site a notice that this Privacy Statement has been changed. We encourage you to review this Privacy Statement regularly for any changes.

## CONTACT US

Seagate Technology LLC or an affiliate controlled by, under common control with, or controlling Seagate Technology LLC, including but not limited to affiliates operating under the LaCie name or brand is located at

Seagate Technology LLC  
10200 South De Anza Boulevard  
Cupertino, California 95014

If you have questions about this Privacy Statement, please contact [data.protection.officer@seagate.com](mailto:data.protection.officer@seagate.com) or:

Seagate Technology LLC  
Attn: Legal Department – Privacy Group  
10200 South De Anza Boulevard  
Cupertino, California 95014

If you live in Germany you may contact:

Dr. Sebastian Kraska  
IITR GmbH  
Marienplatz 2  
80331 München  
<http://www.iitr.de>

You may also contact our data protection officer responsible for your country or region, if applicable, at [data.protection.officer@seagate.com](mailto:data.protection.officer@seagate.com).

You may lodge a complaint with a supervisory authority competent for your country or region. Please click [here](#) for contact information for such authorities in the EEA.

We will also keep prior versions of this Privacy Statement in an archive for your review here:

- [LaCie Collective Privacy Statement](#) - 12/20/2017 (PDF)

**LAST UPDATED: March 15, 2018**