Smartbox

Privacy Policy

Smartbox is committed to protecting and respecting your privacy.

It is your right to be fully informed as to how we handle your personal information – this Privacy Policy covers how we collect, use, share and store your data.

Our Privacy Policy will be updated from time to time. If you use our services, we will update you when there are significant changes that may affect you.

If you have any questions about your personal data and our policies, please email data@thinksmartbox.com

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The Smartbox Privacy Policy was updated on 6th June 2024

Who we are

At Smartbox we create technology to help people with disabilities to communicate.

We are a group of five companies: **Smartbox Assistive Technology Ltd (UK)**, **Smartbox Assistive Technology Inc (US), Smartbox Assistive Technology EU**, **Sensory Software International (UK**) and Rehavista GmbH These companies will be collectively referred to as **Smartbox** and Rehavista

For legal purposes, we have entered into a **Joint Controller Agreement**. This means we will share information between our UK, EU and US operations as one organisation.

The registered address for our head office is: **Smartbox Assistive Technology, Ysobel House, Enigma Commercial Centre, Sandys Road, Malvern, WR14 1JJ, UK**

For US enquiries the registered address is: **Smartbox Assistive Technology Inc,** 168 Hillcrest Shopping Center, Lower Burrell, PA, 15068

For Rehavista enquiries the registered address is: **REHAVISTA GmbH, Konsul-Smidt-Str. 8c, 28217 Bremen, Germany**

For **Talk to me Technologies** enquiries the registered address is: **Talk To Me Technologies, 1100 Technology Parkway, Cedar Falls, IA 50613**

Our parent company

Smartbox is owned in part by **CareTech** and is a part of the CareTech family. We will not share your personal data with CareTech, though we may from time to time embark on projects together that could require us sharing personal information. In these cases, we will inform you of any potential data transfers and allow you to opt out.

For more information about CareTech visit: Privacy | CareTech (caretech-uk.com)

Your personal data

To provide our services to you, we often take personal data.

Personal data is information that can be used to identify you as an individual, such as your name, address, and contact details. Personal data also includes your IP Address, device information and other identifiers.

This policy explains how we look after the data that you provide us with, who has access to it, our legal rights and responsibilities, and your rights as a data subject. It considers all aspects of our company and services, including purchases, the use of our software, our support and marketing. No matter how you interact with us, your privacy is treated with the same level of care and consideration.

The ways we use your data

We will use the information you give to us in the following ways, depending on how you interact with us. You may fit into more than one of these categories:

How you interact with us	How do we use your personal data?	Why do we use personal data?	When do we collect personal data?
If you purchase Smartbox products	We use your data to deliver your products and verify your purchase.	We verify your purchases and store transaction information for tax purposes. We take address information to deliver our products to you.	We collect information from the website or via phone or email to create your quote. We take payment and delivery information after confirming your quote.
If you have a product demonstration from Smartbox	We use the information you give us to arrange your visit and generate any post-visit documentation.	We use the information we gather both before and after your visit to recommend the appropriate Smartbox products.	We take some information on the website when you arrange your visit. We also take information via phone or email when we confirm your visit.
If you use Smartbox software and hardware	If you have created a Smartbox Account, we store your profile so you can use our online services.	To enable you to store and retrieve your data.	When you create your Smartbox Account, and when you make changes to your profile.
If you experience a problem with Smartbox software	When you experience a crash we try to collect anonymous data about your	To help us improve Grid and other Smartbox applications we take	Personal data is removed before transmission of

	device. If more detail is needed we request your consent before we collect it.	anonymous crash data	information occurs.
If you visit the Smartbox website	We use your data to track how our site is performing and measure how visitors use the site. When you fill out a form on our website, the information submitted is sent to the relevant departments.	We track data to maintain and improve the experience for visitors to our website.\n\nWe use the personal data you submit using forms on our website to provide our services to you.	Tracking data is taken when you visit a page on our website.\n\nWhen you input data into a form on the website.
If you contact Smartbox support	We use your data to recall any past support history you may have. We also take information to contact you about your support requests.	To effectively help you with your queries, requests, repairs, and loans. We often need to take some personal information to deliver, receive or contact you regarding your Smartbox product.	When you raise a Support ticket with us. When you contact us via our Online Chat. When you contact Smartbox support via email or phone.
If you opt in to Smartbox marketing messages	We use our newsletter to inform you of important updates, new products, events and training.	We use the data you give us to send you relevant messages, often filtering based on location or product interest.	When you join our mailing list online or at an event. When you opt in to our newsletter. When you complete a form on our website. When you opt in as you create your Smartbox Account.
If you attend Smartbox events or training	We confirm your attendance at one of our events. Send you details prior to the event. Collect feedback on the event.	We use your data to keep you informed about your upcoming training event and ensure we are delivering the best service.	When you order tickets for an event via phone or email. When you sign up for a Webinar.

If you sign up to the Smartbox Academy	We use your data to create your profile on Smartbox Academy	To enable you to log on to Smartbox Academy and access the courses available	When you create your account and make changes to your profile
If you submit the website Contact form	We use your data to understand your requirements and ensure the right team contact you to support your request	We use the personal data you submit using forms on our website to provide our services to you.	When you complete the online Contact form on our website

The data we collect about you

We try our best to only gather the minimum data required to complete our service to you. In some cases, we may record more information based on your requirements.

How you interact with us	What data do we collect?
If you purchase Smartbox products	We collect your delivery information, including name and address
If you have a product demonstration from Smartbox	We collect contact information to carry out the demonstration and following, create a quote based on the visit or trial. We may also create an assessment report on what has been demonstrated. This is for personal use only and will only be shared with your consent. If you are under 16 years old, before collecting any of your personal data, we will obtain the consent to do so from your parent or the person who holds parental responsibility over you.
If you use Smartbox software and hardware	When you create a Smartbox Account, we collect your email address, password, name, and profile picture. If you experience a crash when using Grid, we will receive anonymous data to help us understand and fix issues.
If you visit the Smartbox website	When visiting the Smartbox website with cookies enabled, your IP address is collected and anonymised. We collect information on the pages you visit. When you complete a form, the fields you complete are also sent to Smartbox. These If you download software from our website, we record which product is selected.

If you contact Smartbox support	When you contact Smartbox Support we keep a record of your name and contact information, including phone number and email address. We also keep a record of Online Chat transcripts, and support tickets raised via our website.
If you opt in to Smartbox marketing messages	When you opt into our marketing we keep a record of your first name, last name, country, email address, products you may have downloaded, and events you have attended. We may share your data within the Smartbox group with the relevant company to the country specified in the webform. *We adhere to the data protection principle of legitimate interest when processing your submitted data.*
If you attend Smartbox events or training	When you register or purchase a ticket for a Smartbox event we record your name and contact details, including phone number and email address. We may also record payment details.
If you create an account and use Smartbox Academy	When you create an account, your profile includes your name, email address, bio information if you choose to include it and you job role. We may also record payment details.

Data protection law

For the purposes of this clause, **Data Protection Law** means:
a) the UK GDPR
b) the Data Protection Act 2018
c) the Privacy and Electronic Communications (EC Directive) Regulations 2003
d) any other applicable law relating to the processing, privacy and/or use of **Personal Data**
e) any laws which implement any such laws or replace, extend, re-enact, consolidate or amend any of such laws.

Under data protection law, namely Regulation (EU) 2016/679, the General Data Protection Regulation or "GDPR", and the UK Data Protection Act 2018 (which contains UK GDPR) we rely on three legal bases to maintain and process personal data:

Performance of contract

Most of the data we store is used to ensure our products and services are delivered to you without complication. This includes information like your contact details and delivery address.

Legal obligation

There are some records we need to keep for legal reasons. Financial transactions for example need to be kept by law for a set period of time.

Your consent

When you see check boxes or contracts to sign, this is called consent. You have the right to opt in to sharing your data with us when using online services such as our website, newsletters or your Smartbox account. We will never ask you to opt out or assume your consent, it must be freely given.

Services we use

We rely on a handful of trusted third-party organisations, who handle your data on our behalf so that we can provide our online services.

Service	What for?	Privacy information
Amazon AWS	Smartbox Account information Smartbox Account usage	https://aws.amazon.com/compliance/data-privacy-faq/
Google OAuth	Connection to Google services in Grid	https://developers.google.com/terms/api-services-user-data-policy
SpeakUnique	Customised voice service	https://www.speakunique.co.uk/privacy-policy/
Mailchimp	Mailing lists	https://mailchimp.com/legal/privacy/
Hotjar	Website Usage	https://www.hotjar.com/legal/policies/privacy/
Google Analytics	Website usage	https://policies.google.com/privacy?hl=en
Google G Suite	Internal services	https://gsuite.google.co.uk/intl/en_uk/security/?secure-by-design_activeEl=data-centers
Dropbox	Smartbox Account grid set backup and remote editing.	https://www.dropbox.com/privacy#privacy
Fasthosts	Backup of Online Grids data	https://www.fasthosts.co.uk/terms/privacy-policy
Catalyst2	Our website and form data	https://www.catalyst2.com/privacy/

ZenDesk	Online chat services	https://www.zendesk.co.uk/company/customers-partners/privacy-policy/
Gravity	Our Website and form data	https://www.gravityforms.com/privacy/
Global Payments	Payment transactions	https://www.globalpaymentsinc.com/en-gb/accept-payments/ecommerce/privacy
Clover	Payment Transactions	https://www.clover.com/privacy-policy
Stripe	Payment transactions	https://stripe.com/gb/privacy
Microsoft Azure	Grid telemetry Office software and internal sharing	https://products.office.com/en-gb/business/office-365-trust-center-privacy
Microsoft - Bing Search API	Searching for images in Grid	https://privacy.microsoft.com/en-gb/privacystatement
Apple App Store	Software downloads and purchases	https://www.apple.com/uk/legal/privacy/en-ww/
Estone	Repair centre	http://estonetech.com/privacy-policy/
Sumo	Repair centre	http://www.sumotech.com/english/company/privacy.php
Sentry	Software Issue reporting	https://sentry.io/privacy/
Renovotec	Repair centre	https://renovotec.com/privacy-and-cookies
Microsoft	Repair centre	https://privacy.microsoft.com/en-gb/privacystatement
Apple	Repair centre	https://www.apple.com/uk/legal/privacy/
Jira	Issue tracking	https://www.atlassian.com/legal/privacy-policy
Talent LMS	Smartbox Academy	https://www.talentlms.com/gdpr
Accellier	Internal CRM	https://www.accellier.com/privacy-statement/
ComputerGeeks	IT Support, Data Centres	https://geeks.co.uk/privacy-policy/

	and backups	
ThisisFever	Website development	https://www.thisisfever.co.uk/privacy-policy/
X-Formation	Software licence management	Privacy statement - Software License Management (x-formation.com)
Intuit	Quickbooks - Financial software	https://www.intuit.com/privacy/statement/
Skykick	Internal backups	https://www.skykick.com/privacy-policy/
Printwaste	Certified device and data disposal	https://www.printwaste.co.uk/privacy/
WhatsApp Business	Business communication	https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0 https://www.facebook.com/privacy/policies/data_privacy_framework/

We also share your personal information with trusted operational services such as delivery couriers.

If you make an enquiry from outside the UK, we may share your information with one of our retail partners to fulfil your request.

We may be required to disclose your personal data to the police or other law enforcement and regulatory bodies in your country of origin or elsewhere. These requests take your privacy into consideration and are assessed on a case-by-case basis.

Your rights to your data

You have the right to:

- Access to the personal data we hold about you
- Correct any personal data we hold if it is incorrect or out of date
- Request the removal of any personal data we hold about you. In some cases, we may need to hold certain information for legal reasons
- Object to the processing of information if you feel we have made an incorrect assumption, based on the data that we hold about you
- Restrict any processing of your data until we can verify your information
- Request the transfer of your data to another third-party of your choice
- Withdraw your consent at any time

If you would like to exercise any of your rights, please email data@thinksmartbox.com or call us on 0044 (0)1684 578868.

Please note for multiple requests within a short timeframe or requests for the same information, we may charge you an admin fee. If a third-party is making a request on your behalf, we will require proof of your permission before acting. All requests will be processed and completed within one month.

Opting out

You may opt out of receiving emails from Smartbox at any time, by clicking the unsubscribe link in the footer of any email we send. You can also contact hello@thinksmartbox.com to remove yourself from our mailing lists.

If you hold a Smartbox Account, you can delete the account from your profile page on our website.

How we protect your data

We know how much trust you place in us when you share your personal data. We place great importance on the security of your personal information and will always take appropriate precautions to protect it. This applies to both the physical security of the data we hold, and the high level of digital security features we use.

Our website uses industry standard software protection and is securely encrypted using SSL, so it cannot be read as the information travels over the internet. When you are on a secure page, a closed lock icon on Web browsers such as Firefox and Chrome will indicate this. Even with these precautions, no data transmission over the internet is guaranteed to be 100% secure. Whilst we strive to protect your personal information, we cannot guarantee the security of any information that you disclose to us online, and you must understand that you do so at your own risk.

Where data is backed up we take steps to ensure that it is encrypted and secure. Access to personal information is restricted to employees who need it, and that all staff who handle personal information are fully trained and kept up-to-date on our data management, security, and privacy practices. Our employees are notified and reminded about the importance we place on privacy, and what they can do to ensure your information is protected.

The length of time we keep your data

We only keep your personal data for as long as necessary.

Information taken to generate or fulfil a quote, or carry out a visit

We are legally obliged to keep your Order information for seven years. We also keep visit information for seven years, to comply with regulations.

Smartbox Account

If you create a Smartbox Account, we will only keep your data for 12 months after the account becomes inactive.

Smartbox Newsletter

We will keep you on our mailing lists for as long as you continue to show interest in Smartbox. Your data will be stored for 18 months after your last opened email.

Smartbox Support

If you contact our Support Team using the Online Chat service, conversations will be recorded for ten years. We will also keep details and notes of support tickets for up to ten years to equal the full product lifespan from initial date placed on the market to the product end of life.

Repair Services

During any repair procedures, with your consent, we keep backups of device data for up to three months. We will keep details and notes of support tickets and repairs for up to seven years, for legal purposes.

Website forms

Any form submitted to the website is stored for a maximum of 30 days.

Our software

Grid for iPad and Grid 3

Both Grid 3 and Grid for iPad have built-in features that transfer data to our third-party online services.

You will always be asked to opt in for these features:

Feature	Stored on your device	Stored online (if linked to a Smartbox Account)	Requires a Smartbox Account	Requires a Dropbox account
Chat History	Yes	No	No	No
Message Banking	Yes	Yes	No	Yes
Email account information	Yes	No	No	No
Grid sets	Yes	Yes	Yes	Yes
User settings	Yes	No	No	No
Dropbox account	Yes	No	No	Yes
Remote Editing	Yes	No	Yes	Yes
Pronunciation	Yes	No	No	No
Location data	Yes	No	No	No
Prediction data	Yes	No	No	No
Contact information	Yes	No	No	No
Browser history and favourites	Yes	No	No	No
SMS and Phone call	Yes	No	No	No
SpeakUnique	Yes	No	No	No

By default, Grid 3 will not store your user information online.

Grid for iPad **requires** a Smartbox Account, however the app itself will not store any user-specific information online unless you opt in. See the section on **Smartbox Account data** to view the personal information we process when you create a Smartbox Account.

Google OAuth disclosure

Grid and Grid for iPad use Google OAuth to allow you to access google services like Gmail and YouTube.

Grid 3 and Grid for iPad use and transfer to any other app, of information received from Google APIs will adhere to Google API Services User Data Policy, including the Limited Use requirements.

SpeakUnique

Connecting your Grid user profile to SpeakUnique stores a token on your device to authorise and download your custom voice.

Telemetry

To help us maintain and improve Grid, its associated services and Look Lab, we collect telemetry data from your device when it is connected to the internet.

This information is completely anonymized at the point of collection and no personal information is stored.

Crash reporting

When Grid crashes it will send us anonymised data about your device and its processes via Sentry and Jira. This information helps us continue to improve the performance and stability of Grid and prioritise the most common issues.

Smartbox Account data

Your Smartbox Account enables you to transfer information between your devices, share grid sets, backup information and personalise your Grid experience. To do this, we store the following information:

Data	Why we store this
Email address	To allow you to access your account
Name	To identify your account
Picture	To display your profile in your software
Password	To allow you to access your account
Dropbox access token	If you link your Dropbox account, this maintains the authorisation
Devices connected	To maintain the link between your software and account
Operating system	To help us understand what devices our software is active on
Software version	To help us monitor how our software is used
Language	To provide you with information in your language

When you link your Smartbox Account to Dropbox, it will store the following information:

Data	Why this is stored in Dropbox
Grid sets	To enable you to sync and backup grid sets, and allow remote editing
Message banking files	To allow you to sync and backup your voice files

We do not have access to this data. We only manage the link between your Smartbox and Dropbox account.

Grid Player

Grid Player requires a Smartbox Account to download and access grids.

The Grid 2

The Grid 2 does not store any user data online. All data regarding your social media and email accounts is stored locally and is never shared. As of 2019 we no-longer support The Grid 2 and is used at your own risk.

Online Grids

You will need to have a Smartbox Account to share your grid sets on Online Grids. If you choose to share grid sets online, you should always ensure that they do not include any of your personal information as they will be available for anyone to download.

Look to Learn, Look to Read and Look Lab

If you opt-In, Look Lab will collect anonymous telemetry data If you use your device when connected to the internet.
Look to Learn and Look to Read do not store any personal information.

Licence Manager

Our Smartbox Licence Manager is installed with each of our Windows software titles and is used to licence your software. When you licence your software, we record your licence key, the registry information from your device and your device IP. This information goes to Amazon S3 and is anonymised upon transmission. We remove this data within 30 days.

Smartbox Update

Our Smartbox Update is a background process that checks the version number of your software with our server and notifies you if there is an update available. Once you choose to update, our server will deliver the update file to your device. The Smartbox Update process does not transfer any data to our servers.

Shop.thinksmartbox.com

If you are purchasing a licence for software, voices or symbols online, we process the transaction through shop.thinksmartbox.com. As this is a financial transaction, we use RealEx payments to process the payment, and only pass on what is necessary to authorise. We record your details for our records and maintain these for 7 years.

Data relating to children

Due to the nature of the work we carry out we are often supporting people under the age of 16. In these cases we endeavour to protect the privacy of the individual and seek consent from legal guardians to record information to our standards.

Data relating to your health

We are specialised in dealing with issues relating to your health. In no cases will we ever reveal details of any health conditions to our third parties.

We will only process your health-related personal data if you have given us your explicit consent to do so.

Use of cookies

Our website uses cookies that enable us to provide you with a good experience when you browse and help us to improve our site. They also remember you when you return to our site and help you pick up where you left off.

These small text files are placed on your computer by the websites you visit, and are widely used across the internet to make websites work more efficiently. Most web browsers allow some control over your cookies, through the browser settings. To find out more about managing your cookies, visit: www.allaboutcookies.org

When you view pages on our website or download resources, we capture information about your visit. This data is completely anonymised and relates to the following:

- The internet domain and IP address from which you access our website
- The type of browser, device, and operating system you use
- The date and time of your visit
- The pages you visit
- If you followed a link to our website, the address of that site

We do not know (and do not wish to know) the identities of the individuals who visit our website.

If you have any further questions, please email data@thinksmartbox.com.

Managing cookies

The ThinkSmartbox.com website has a cookie manager loaded when you first visit the page.

You can choose to accept all cookies, or mange each directly. We have included a short breakdown of these below.

Third-party cookies

Third-party	Cookie usage
Google Analytics	Anonymously tracks how you are using our website, the pages you visit and the device and browser you use. No personally identifiable information is collected. This information is used to improve the experience for visitors to our site.

ZenDesk Support	Maintains our online chat window and manages the conversation while you browse the site
YouTube and Vimeo	Tracks whether you have watched a video on their service.
Hotjar	Hotjar helps us anonymously track how users are using our website and allows you to send us feedback when something is wrong (or right!)
Talent LMS	Login and user account cookie to track progress
Microsoft CRM	Maintains our online chat window and manages the conversation while you browse the site

Links to other websites

Our website occasionally provides links to other websites that we do not have control over. Our Privacy Policy only applies to our website and services.

Contacting the regulator

If you feel that your data has not been handled correctly or you are unhappy with our response regarding your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

You can reach the ICO by calling 0303 123 1113 or visiting their website: www.ico.org.uk/concerns

If you are based outside the UK, you have the right to complain to lodge a complaint with the relevant data protection regulator in your country of residence.

Review of our policy

We review our Privacy Policy from time to time as our software and services evolve. It is also reviewed line with changes to the law. We will update you when significant changes have been made, that may affect you.

This policy was last updated 6th June 2024.