

Privacy Notice

Last Updated: 21 December 2023

Who are we?

We are IRIS, providers of a suite of patented products, which leverage decades of research into the effects of sound on the brain, prioritising focus, productivity, and wellness for all, including voice isolation software and headphones. At IRIS, we collect a variety of information about people we interact with as part of our business and may use such information in different ways. We are committed to ensuring that your personal data is protected and never misused.

When we refer to **“IRIS”**, **“us”**, **“we”** or **“our”**, we mean the IRIS group company or companies who are responsible for personal data collected about you in the United Kingdom (‘UK’): (i) IRIS Clarity Limited; or (ii) IRIS Audio Engineering Limited, as explained in more detail in the *‘Who is the data controller?’* section below.

Why are you reading this?

This privacy notice describes how we protect personal data and respect privacy in accordance with data protection laws, including the UK General Data Protection Regulation (**“UK GDPR”**), the Privacy and Electronic Communications Regulations (**“PECR”**) and the Data Protection Act 2018 (collectively the **“Data Protection Laws”**).

Does it apply to you?

This privacy notice applies to you if: (i) you use any of our services or products (including IRIS Clarity, IRIS Clarity Studio, IRIS Clarity for server implementation (**“SDK”**) and IRIS’ headphones); (ii) you visit our website (<https://iris.audio/>) (the **“Website”**); (iii) if you attend, or register to attend any of our events; (iv) if you register interest in documents available for download on our Website (such as research papers); and (iv) if you or your employer has a business relationship with IRIS. Please take a moment to read it!

Sometimes you provide us with personal data, sometimes personal data about you is collected automatically, and sometimes we collect it from third parties.

This privacy notice does not apply to any third-party applications or software that integrate with our products or services, or any other third-party products, services or businesses who will provide their services under their own terms of service and privacy notice.

What personal data do we collect?

Users of IRIS Clarity and IRIS headphones, in each case, purchased directly from IRIS	
Identity data	Name.
Contact data	Email address, address.
Financial data	Billing details, including credit/debit card details and billing address.
Marketing and communications data	Your marketing preferences.
Warranty data	Product purchased and information in relation to the warranty claim.
Usage data	Use or installation of the product purchased, versions downloaded, debugging data, licence status information and other usage information, including volume of files processed.
Other data	Any extra information you choose to provide or tell us.

Users of IRIS Clarity Studio, purchased directly from IRIS	
All data as outlined in respect of users of IRIS Clarity and IRIS headphones outlined above.	
Content and	The content and metadata of the files you upload to IRIS

metadata data	Clarity Studio. Such content also contains file name, size and file type.
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Users of IRIS Clarity where access is given to you by your employer	
Identity data	Name.
Contact data	Business email address.
Usage data	Use or installation of the product purchased, versions downloaded, debugging data, licence status information and other usage information, including volume of files processed.
Other data	Any extra information you choose to provide or tell us.

Users of IRIS Clarity for Server Implementation; Users of Applications developed using the IRIS Clarity for Server Implementation	
Usage Data	Use or installation of the SDK, versions downloaded, debugging data, licence status information, and other usage information, including volume of users (if applicable).
Other data	Any extra information you choose to provide or tell us.

Website and Dashboard users (including Clarity users and headphone users)	
Device and web data	Your IP address, browser types, browser language, operating system, statistics on page visited, the state or country from which you accessed the website, software and hardware attributes (including device IDs), referring and exit pages and URLs, platform type, the number of clicks, files you download, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the terms you use in

	searches on our sites, the date and time you used the website and upload or post content, error logs, and other similar information.
'Contact us' data	Any information you provide when you contact us through our website, which may include name, email address and details of your query.

Event attendees, individuals who register for events and individuals who register interest in documents available for download on our Website

Identity data	Name.
Contact data	Email address.
Marketing and communications data	Your marketing preferences.
Other data	Any extra information you choose to provide or tell us.

Individuals with whom we have a business relationship

Contact and work details data	Your name, job title, work contact details, such as your work email address and work telephone number.
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Why do we process your personal data?

Data Protection Laws require that we only use your data for purposes that we tell you about and where we have a legal basis to do so. Here are the purposes and legal bases for which we process the personal data talked about above:

Personal Data Processed	Purpose(s)	Legal Basis
Identity data	To offer and provide our services and products to you.	Legitimate interests (provision of IRIS'

		products and services); Contract
Contact data	To communicate with you about our services or products, dispatch and track information (where applicable).	Legitimate interests (provision of IRIS' products and services); Contract
Financial data	To complete a purchase that you have requested, including invoicing and accounting. Please note that if you do not provide us with this data, we will not be able to complete your purchase.	Legitimate interests (to administer our business); Contract
Marketing and communications data	To send you marketing or promotional information.	Consent; Legitimate interests (to send marketing communications to customers or potential customers)
Warranty data	To provide you with our warranty services (where applicable).	Legitimate interests (provision of IRIS' products and services); Contract
Device and web data	To improve the websites and our products; engage in analysis, research and reports regarding use of our website and products.	Legitimate interests (improving IRIS' website and products)
Usage Data	To provide you with the applicable product, monitor its use and for analytics purposes to improve the	Legitimate interests (provision of IRIS'

	product; to provide you or your employer with accurate billing information where IRIS' products are being charged on a consumption basis.	products and services); Contract
Content and metadata data	To provide you with our IRIS Clarity Studio services.	Contract; Legitimate interests (provision of IRIS' products and services)
'Contact us' data	To provide customer support and deal with any queries you may have.	Legitimate interests (to administer our business); Contract
Contact and work details data	To manage the contract or business relationship we have with either you or your employer.	Legitimate interests (to manage our contracts and business relationships)

Furthermore, we will process your personal data for the following purposes: (i) to comply with our legal obligations; and (ii) to establish, exercise or defend our legal rights where it is necessary for our legitimate interests or the legitimate interests of others.

More information on what these legal bases mean:

- **Contract:** Processing your personal data is necessary for a contract you have with us, or because we have asked you to take specific steps before entering into the contract, e.g. we need your personal details (contact details, billing information) in order to process your subscription for use of our products and services.
- **Legitimate interests:** Processing your personal data is necessary for our legitimate interests, provided that those interests are not outweighed by your rights and interests. Our legitimate interests are listed above.

- **Consent:** We may ask for your consent to process your personal details in certain circumstances, e.g. we ask for your consent to use personal data for marketing purposes.

You have the right to withdraw your consent at any time. Further details can be found in the '*Direct Marketing*' and '*What are Your Rights?*' sections below.

- **Legal obligations:** Processing your data is necessary for us to carry out our obligations under applicable law e.g. to comply with our record-keeping requirements.

Who is the Controller?

The IRIS group company primarily responsible for your personal data, what we collect about you, why we collect it, how we use it legally and for how long we keep it for will depend on the context of your relationship with IRIS. We have included relevant details below.

- IRIS Clarity Limited processes your personal data in the context of your relationship with us as the providers of any of the Clarity products and services, or in relation to any research papers, events or other activities linked to these products and services.
- IRIS Audio Engineering processes your personal data in the context of your relationship with us as the providers of IRIS' headphones and any activities linked to IRIS' headphones.

Direct Marketing

Where required under relevant Data Protection Laws, we will obtain your opt-in consent before sending you marketing messages, unless we are permitted to contact you without your opt-in consent in relation to goods and services which are similar to those which you have already purchased, used or interacted with. We often seek your consent to use your personal data for any marketing purposes.

In relation to marketing messages, you may opt out at any time if you no longer wish to receive these messages from us, by following the unsubscribe link included in our marketing material.

Who will have access to your personal data?

Sometimes it is necessary for us to share your personal data with third parties. Your personal data is shared only when we consider it to be necessary and according to the safeguards, and for the purposes, detailed in this privacy notice.

- **Third party service providers:** We share your personal data with third parties that we rely upon to perform a variety of services on our behalf that help us to offer and improve our products and services (such as hosting providers), organisations that provide us with technical support services, professional advisers and payment system operators.
- **Our group companies:** We will share personal data in certain circumstances with other IRIS group companies.
- **Regulators or other authorities:** We will share your personal data where we are legally required to do so or where we think this is required and we are permitted to do so, for example to respond to a request for cooperation from a relevant authority.
- **Other third parties to protect us:** We may share your personal data as required in order to help prevent fraud or to protect or enforce IRIS' rights.
- **Other parties as part of a corporate transaction:** If it is proposed that IRIS is to merge with or be acquired by another business in the future, we may share your personal data with potential purchasers, where this is necessary, or the new owners of the business or company.

We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.

IRIS Clarity: Processing of personal data in the context of the IRIS Clarity product takes place on your device in real time, and none of that personal data is stored on IRIS' servers (hosted by Google).

IRIS Clarity Studio: Where you upload a file onto IRIS Clarity Studio, such file is stored on IRIS's servers (hosted by Google).

Overseas transfers of personal data

We may engage an overseas service provider to provide services to us, such as cloud-based storage solutions, where personal data may be processed on servers located outside of the UK. Our servers are hosted by Google and data is located in the UK, Frankfurt and Belgium.

Where we transfer your personal data outside of the UK we ensure a similar degree of protection is afforded to your personal data as in the UK. We do this by sending your data to countries that the UK has deemed to provide essentially equivalent protection or by entering into UK approved standard contractual clauses with the relevant party.

How do we protect your personal data?

We take steps to make sure that we have in place technical and organisational measures in order to protect your personal data from being damaged, changed, lost, used in the wrong way, or accessed by people who do not have permission.

However please remember that you provide personal data at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure.

We follow recognised industry practices for protecting our IT environment and physical facilities. We further protect personal data by restricting access to your personal data to only those who need access to the personal data to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal data.

How long do we keep your personal data?

We may retain information as required or permitted by applicable laws and regulations, including to honour your choices, for our billing or records purposes and to fulfil the purposes described in this privacy notice. Specifically, we retain information for our legitimate interests and essential business purposes, such as operating, maintaining and improving our services; complying with our legal obligations; and exercising our legal rights and remedies, including enforcing our terms of use.

We will then destroy or anonymise the data. Anonymised data is not personal data.

What are your rights?

As a data subject, you have various rights in relation to the personal data we hold about you. Some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all. We will always tell you if we think we do not have to comply.

- **Right to object to processing of your personal data:** You can object to us using your personal data if we are using it for the purpose of our legitimate interests, including where we are using it for direct marketing purposes;
- **Right of access to your personal data:** You have the right to obtain a copy of your personal data from us and obtain any other supplementary information from us;
- **Right to correct any mistakes in your personal data:** You have the right to request that we correct any inaccurate or incomplete personal data we hold about you;
- **Right to restrict our processing:** You have the right to restrict our processing of your personal data in certain circumstances. This means that you may be able to limit the way that we use your personal data;
- **Right to have your personal data ported to another controller:** We will give you a copy of your personal data so that you can provide it to another service. If you ask us and it is technically possible, we will transfer the data directly to the other service for you;
- **Right to be 'forgotten' by us:** You can do this by asking us to erase any personal data we hold about you in certain circumstances, including if it is no longer necessary for us to hold that personal data;
- **Right to withdraw consent:** Where we are processing your personal data based on your consent, you have the right to withdraw your consent at any time.
- **Right to lodge a complaint with the ICO:** You can make a complaint to the UK Information Commissioner's Office, as directed on their website www.ico.org.uk. Please think about telling us first though, so we have a chance to address your concerns.

Rights in relation to automated decision making do not apply as we do not carry out any automated decision making.

To exercise your rights, contact us using the details given in the 'Contact Us' section below.

Cookies

We use cookies on this website. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. We explain our use of cookies further in our cookies policy.

How to contact us

If you have any questions, concerns or complaints about this privacy notice or how we handle your personal data, or to exercise any of your rights detailed above, please contact our data protection team at legal@shapedbyiris.com. Please contact us if there have been any updates to the information we hold about you.