

U.S. STATE PRIVACY SUPPLEMENT

Effective Date: January 8, 2024

U.S. STATE PRIVACY SUPPLEMENT SCOPE

This U.S. State Privacy Supplement (this “**Supplement**”) supplements our Privacy Policy by providing additional information about our personal information processing practices and individual rights to the extent required by applicable state privacy laws (“**U.S. State Privacy Laws**”). In the event of any inconsistencies between the provisions detailed in this Supplement and our Privacy Policy, the provisions of this Supplement shall prevail.

If you have disabilities that require receipt of this notice in an alternative accessible format, please contact us at either at (855) 425-8959 or privacy@turtlebeach.com for information on how to obtain this Supplement in an alternative format.

THE SERVICES ARE NOT INTENDED FOR MINORS

We understand the importance of protecting children's privacy in the interactive online world. The Services are not designed for, or intentionally targeted at, children under 18 years of age. It is not our policy to intentionally collect or maintain information about anyone under the age of 18. No one under the age of 18 should submit any personal information to us or the Services. Further, minors under 18 years of age may have the personal information that they have provided to us through the Services deleted by sending an email to privacy@turtlebeach.com requesting deletion.

DEFINITION OF “PERSONAL INFORMATION”

As used in this Supplement, the term “personal information” means information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device, or would otherwise qualify as “personal information” or “personal data” under U.S. State Privacy Laws (“**personal information**”).

“Personal information” does not include:

- De-identified or aggregated consumer information,
- Publicly available information from government records,
- Information excluded from the scope of the individual U.S. State Privacy Laws including, but not limited to, personal information covered by sector-specific privacy laws like the Fair Credit Reporting Act, the Graham-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver’s Privacy Protection Act of 1994, and
- Health or medical information covered by the Health Insurance Portability Accountability Act, the California Confidentiality of Medical Information Act or clinical trial data.

ADDITIONAL PERSONAL INFORMATION DISCLOSURES

Sales, Sharing and Targeted Advertising

We may “sell” or “share” your personal information (as those terms are defined by U.S. State Privacy Laws), subject to your right to opt out of such sales and sharing (see “Your Privacy Rights and Choices” below).

For example, we may allow third-party advertising networks, social media companies and other third-party businesses to collect information directly from your browser or device through cookies or similar tracking technology when you visit or interact with our website, use our apps or otherwise engage with us online and use that information for targeted or cross-context behavioral advertising. Please see the “Cookies and Other Tracking Technologies” section of our Privacy Policy for additional information.

We do not “sell” or “share” the personal information of consumers we know to be less than 16 years of age.

Deidentified Information

We may at times receive, or process personal information to create, deidentified data that can no longer reasonably be used to infer information about, or otherwise be linked to, a particular individual or household. Where we maintain deidentified data, we will maintain and use the data in deidentified form and not attempt to reidentify the data except as required or permitted by law.

YOUR PRIVACY RIGHTS AND CHOICES

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

<i>The Right to Know</i>	<p>The right to confirm whether we are processing personal information about you and, under California law only, to obtain certain personalized details about the personal information we have collected about you, including:</p> <ul style="list-style-type: none">• The categories of personal information collected;• The categories of sources of the personal information;• The purposes for which the personal information were collected;• The categories of personal information disclosed to third parties (if any), and the categories of recipients to whom the personal information were disclosed;
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	<ul style="list-style-type: none"> • The categories of personal information shared for cross-context behavioral advertising purposes (if any), and the categories of recipients to whom the personal information were disclosed for those purposes; and • The categories of personal information sold (if any), and the categories of third parties to whom the personal information were sold.
<i>The Right to Access & Portability</i>	The right to obtain access to the personal information we have collected about you and, where required by law, the right to obtain a copy of the personal information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
<i>The Right to Correction</i>	The right to correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.
<i>The Right to Deletion</i>	The right to have us delete the personal information we maintain about you.
<i>Right to Object to Targeted Advertising, Profiling, Sharing, or Selling</i>	You may have a right to opt-out of the processing of your personal information for the purposes of targeted advertising, the profiling of your information in furtherance of decisions that produce legal or similarly significant effects, “sale” of your personal information, and sharing of your personal information for purposes of cross-context behavioral advertising (as all such terms and concepts are defined under applicable law).

Submitting Privacy Rights Requests

You can submit a request to exercise one of the privacy rights identified above by:

- Calling us at (855) 425-8959;
- Submitting a request to us [here](#); or
- Sending us an email to the following email address: privacy@turtlebeach.com

We may also respond to opt-out preference signals on your browser or device.

Before processing your request, we may need to verify your identity and confirm you are a resident of a state that offers the requested right(s). Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include sending us an email from the address you used when establishing an account, placing an order, when signing up for our newsletters, when entering a contest, or by logging into your account and making the request through your account portal.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot take action in response to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

If we need to request personal information from you, that we do not already have, in order to verify your request, we will only use such personal information for purposes of verifying the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

The response we provide will explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

To Exercise Your Right to Opt-Out of Personal Information Sales or Sharing

As is common practice among companies that operate online, we allow certain third-party advertising networks, social media companies and other third-party businesses to collect information directly from your browser or device through cookies or similar tracking technology when you visit or interact with our website, use our apps or otherwise engage with us online. For

example, these third parties may collect Internet/network information, such as a cookie or device ID, browsing history and website usage, geolocation data, and inferences generated from your browsing history and interactions with our service as well as other sites and services. These third parties use this information to serve relevant ads on our site, on other websites or mobile apps, or on other devices you may use, or to personalize content and perform other advertising-related services such as reporting, attribution, analytics and market research. These third-party businesses may use such information for their own purposes in accordance with their own privacy statements, which may include reselling this information to additional third parties, including other advertising networks. To learn more, please see our [Privacy Policy](#).

By visiting [here](#), you can opt out from sales of this type of personal information by businesses that participate in the opt-out tool. To make opt-out requests related to mobile apps on your device for businesses participating in the DAA's App-based Opt-Out Tool, you can download the appropriate app at <https://www.privacyrights.info/>. We may also respond to opt-out preference signals on your browser or device.

To exercise the Right to Opt-Out of Personal information Sales or Sharing, you may also submit a request by clicking on the following link:



Non-Discrimination

We will not discriminate against you for exercising any of rights described above. To the extent prohibited by U.S. State Privacy Laws, if you exercise one of these rights we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Please note that we may offer you certain financial incentives permitted by U.S. State Privacy Laws that can result in different prices, rates, or quality levels as described below.

Submitting Authorized Agent Requests

In certain circumstances, you are permitted to use an authorized agent to submit requests on your behalf through the designated methods set forth above where we can verify the authorized agent's authority to act on your behalf. In order to verify the authorized agent's authority, we

generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

Appealing Privacy Rights Decisions

Depending on your state of residency, you may be able to appeal a decision we have made in connection with your privacy rights request. All appeal requests should be submitted to privacy@turtlebeach.com. When you submit a request or launch an appeal, we will limit our collection of your information to only what is necessary to securely fulfill your request or process your appeal. We will not require you or your authorized agent to pay a fee for the verification of your request or appeal.

CALIFORNIA-SPECIFIC DISCLOSURES

The following disclosures only apply to residents of the State of California.

Processing of Personal Information

California law requires we provide disclosures to you about what personal information we collect or process about you now and have collected or processed about you in the previous 12 months by reference to the enumerated categories of personal information set forth within the California Consumer Privacy Act, as amended (“CCPA”). To address this obligation, we have identified below the relevant enumerated CCPA personal information category for the personal information, sources and purposes described in our [Privacy Policy](#):

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, phone number, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, physical characteristics or description, address, or telephone number. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression,	NO

Category	Examples	Collected
	pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location, such as by reference to the geographic location associated with your IP address.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Job title, name of employer.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES
L. Sensitive Personal Information	Personal information that reveals a person's (i) social security number, driver's license, state identification card, passport number; (ii) log-in, financial account	NO

Category	Examples	Collected
	information, in combination with any required security or access code; (iii) precise geolocation information; (iv) racial or ethnic origin, citizenship or immigration status, religious or philosophical beliefs, (v) mail, email or text message content; or (vi) genetic data.	

We collect such personal information from the following sources: directly from you, from our business partners and affiliates, from your browser or device when you use our Services, or from third parties that you permit to share information with us. Please see the section of our [Privacy Policy](#) entitled “Collection of Personal Information” for more detailed information about the sources of personal information we collect, and the section of our Privacy Policy entitled “How We Use Personal Information” for a description of the business and commercial purposes for which we collect personal information.

We disclose all of these categories of personal information for a business purpose to service providers or other third parties at the consumer’s direction, For more information on our disclosure of personal information for business or commercial purposes, please see in the section of our [Privacy Policy](#) entitled “How We Share Personal Information.”

HOW WE SELL AND SHARE PERSONAL INFORMATION

In the preceding twelve (12) months, we have sold and shared, certain categories of personal information.

We may allow third-party advertising networks, social media companies and other third-party businesses to collect information directly from your browser or device through cookies or similar tracking technology when you visit or interact with our website, use our apps or otherwise engage with us online and use that information for targeted or cross-context behavioral advertising. The categories of personal information we may share with such entities may include:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category G: Geolocation data.

Category H: Sensory data.

Category I: Professional or employment-related information.

Category K: Inferences drawn from other personal information.

We do not have actual knowledge that we “sell” or “share” personal information of California residents under age 16.

Notice of Financial Incentives

We may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. For some incentives, we may ask to collect or share your personal information, such as name, contact information, professional information, account information, or shopping transaction information. We have determined that the value of these incentives to us is reasonably related to the value of the personal information we receive and otherwise process in connection with these incentives, based on our reasonable but sole determination. We estimate the value of the personal information we receive and otherwise process in connection with these incentives by considering the expense we incur in collecting and processing the personal information, as well as the expenses related to facilitating the incentives.

The terms applicable to each incentive are provided at the time an eligible individual is offered an opportunity to participate. Interested individuals can opt-in to these incentives by following the instructions presented at the time the offer is made. Participating individuals may withdraw from our incentives at any time by following the instructions provided in connection with each offering or calling (855) 425-8959. Participating individuals may also opt out of receiving marketing communications upon request.

Data Retention

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. To determine the appropriate retention period for your personal information, we will consider the amount, nature and sensitivity of the personal information, the potential risk from unauthorized use or disclosure, the purposes for which we process personal information and whether we can achieve those purposes through other means, and applicable legal requirements.

Shine the Light

California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not currently share personal information with third parties for their direct marketing purposes.

EXERCISING YOUR CALIFORNIA PRIVACY RIGHTS

Please see the section of this Supplement entitled “Your Privacy Rights and Choices” for a description of the rights that the CCPA confers upon California residents and an explanation of how California residents can exercise their CCPA rights.

CHANGES TO THIS SUPPLEMENT

We reserve the right to amend this Supplement at our discretion and at any time. When we make changes to this Supplement, we will post the updated Supplement and update the Supplement’s effective date.

CONTACT INFORMATION

If you have any questions or comments about this Supplement, the ways in which we collect and use your information described above, your choices and rights regarding such use, or wish to exercise your rights under U.S. State Privacy Laws, please do not hesitate to contact us at:

Phone: (855) 425-8959

Email: privacy@turtlebeach.com