



## Privacy Notice

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 Notice covers how we collect, use, share and store your data.

Our Privacy Notice 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](mailto:data@thinksmartbox.com)

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### Who we are

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

We are a group of eight companies: **Smartbox Assistive Technology Ltd (UK), Smartbox Assistive Technology Inc (US), Smartbox Assistive Technology (EU) IRE, Smartbox Assistive Technology SAS (FR), Rehavista GmbH, LogBUK GmbH, Talk to Me Technologies LLC and Klein & Melgert Developments nv**. These companies will be collectively referred to as **Smartbox, TTMT, Rehavista, LogBUK and KMD**

For legal purposes, we have entered into a **Joint Controller Agreement**. This means we may 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 **Smartbox Ireland** enquiries the registered address is: **Smartbox Assistive Technology Room 136, Regus Block 1, Blanchardstown Corporate Park, Ballycoolen Road, Blanchardstown, D15 AKK, Ireland**

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

For **LogBUK GmbH** enquiries the registered address is: **LogBuk 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**

For **Smartbox France** enquiries the registered address is **Smartbox Assistive Technology SAS, 11 place chevert, 55100, Verdun**

**For Klein & Melgert Developments nv** enquiries the registered address is: **KMD, 't Holland 24  
6921 GW Duiven, Netherlands**

### **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 device information and other identifiers.

We may collect personal data if you use any of our services. The categories of data we collect include:

- Contact data: name, address, email address, phone number.
- Health data: to support you with our products and services we may collect health data to support you. We only collect health data if you have if you have provided explicit consent.
- Usage data: anonymous information on how you interact with our software, this only applies if you have opted in to usage statistics in our software.
- Feedback and Survey data: Opinions, comments or responses provided by you.

We rely on four lawful bases to 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.

**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.

**Legitimate Interest:** We may process your personal data based on our legitimate interests, provided these interests are not overridden by your rights and freedoms. This includes activities such as improving our services, technical support, and conducting business operations.

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. We will only process your data for purposes that are reasonable and expected, in line with our privacy policy and applicable data protection laws.

### **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.

## Data Transfers

We may also share your data with trusted third parties to support you when using our products and services and to support the smooth running of our business operations, including but not limited to:

The Smartbox Group: to support you when using our products and services.

Regulatory and Legal: to meet any legal obligations and to ensure compliance

Service: to support the delivery and ongoing support of our products and services,

When we transfer data, we ensure there are appropriate and adequate safeguards in place to ensure your data is secure.

We will never sell your data to third parties for commercial purposes.

List of approved third parties [Sub Processors.docx](#)

## Data Security

We prioritise the security of your personal information and implement robust measures to protect it from unauthorised access, disclosure, alteration, or destruction. Our security practices include encryption, access controls, and regular security audits to ensure the integrity and confidentiality of your data. By continuously monitoring and enhancing our security protocols, we strive to safeguard your information and maintain your trust.

Our data breach process is aligned with all relevant regulatory requirements and applicable data protection laws. In the event of a data breach, we will:

- Promptly identify and contain the breach
- Notify affected individuals and relevant authorities in accordance with regulatory timeframes
- Implement appropriate measures to mitigate potential harm
- Review and update our security practices to prevent future breaches

## Artificial Intelligence

We may use Artificial Intelligence (AI) technologies to enhance our products, systems or services.

We have created an AI Ethics Statement to share with you the principles that govern AI use at Smartbox [Our commitment to ethical use of AI in AAC - Smartbox](#)

In our use of AI, we adhere to all applicable data protection laws and regulations.

## The length of time we keep your data

We only keep your personal data for as long as necessary to fulfil the purposes for which it was collected. This includes providing you with our products and services, responding to your questions and inquiries and improving the quality of our solutions. We also consider the nature of the data and any contractual, legal or regulatory requirements when reviewing the retention period.

## 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](mailto: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](mailto: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.

### **Data relating to children**

Our products are designed for people of all ages. We do not directly control who ultimately uses our products after purchase, so we encourage legal guardians to supervise the use of our products. If we become aware we have collected personal information from a child without proper consent, we will take steps to delete the information as soon as possible.

We will seek the consent of legal guardians acting on behalf of a child if we, in the provision of our products and services, record any personal information.

### **Data relating to your health**

We are specialised in dealing with issues relating to your health. We will only process your health-related personal data if you have given us your explicit consent to do so.

We will not reveal details of any health conditions to our third parties without your consent.

### **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](http://www.allaboutcookies.org)

## **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.

## **Contact details**

If you have any questions about this Privacy Notice, or any other data protection questions, please contact us.

**Email:** [data@thinksmartbox.com](mailto:data@thinksmartbox.com)

**Address:** Smartbox Assistive Technology Limited, Ysobel House, Enigma Commercial Centre, Malvern, Worcestershire, WR14 1JJ, United Kingdom

## **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](http://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.

Smartbox France: CNIL Commission nationale de l'informatique et des libertés [Contact us](#) | [CNIL](#)

## **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. We recommend that you check this page regularly to keep up to date.

This policy was last updated March 2025.