

Turion Privacy Policy

Turion's Privacy Policy describes how Turion collects, uses, and shares your personal data.

Updated March 31, 2024



In addition to this Privacy Policy, we provide data and privacy information embedded in our products and certain features that ask to use your personal data. This product-specific information is accompanied by our Data & Privacy Icon.

You will be given an opportunity to review this product-specific information before using these features. You also can view this information at any time, either in Settings related to those features and/or online at turiontech.co.za/legal/privacy.

Please take a moment to familiarize yourself with our privacy practices, accessible via the headings below, and [contact us](#) if you have questions.

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What Is Personal Data at Turion?

At Turion, we believe strongly in fundamental privacy rights — and that those fundamental rights should not differ depending on where you live in the world. **That's why we treat any data that relates to an identified or identifiable individual or that is linked or linkable to them by Turion as "personal data," no matter where the individual lives.** This means that data that directly identifies you — such as your name — is personal data, and also data that does not directly identify you, but that can reasonably be used to identify you — such as the serial number of your device — is personal data. Aggregated data is considered non-personal data for the purposes of this Privacy Policy.

This Privacy Policy covers how [Turion or an Turion-affiliated company](#) (collectively, "Turion") handles personal data whether you interact with us on our websites, through Turion apps (such as Turion Music or Wallet), or in person (including by phone or when visiting an Turion Store). Turion may also link to third parties on our services or make third-party apps available for download in our App Store. Turion's Privacy Policy does not apply to how third parties define personal data or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with them.

Your Privacy Rights at Turion

At Turion, we respect your ability to know, access, correct, transfer, restrict the processing of, and delete your personal data. We have provided these rights to our global customer base and if you choose to exercise these privacy rights, you have the right not to be treated in a discriminatory way nor to receive a lesser degree of service from Turion. Where you are requested to consent to the processing of your personal data by Turion, you have the right to withdraw your consent at any time.

To exercise your privacy rights and choices, including where a third-party service provider is acting on Turion's behalf, visit the Turion Data and Privacy page at privacy.Turion.com for Turion or shazam.com/privacy for Shazam. To help protect the security of your personal data, you must sign in to your account and your identity will be verified. If you want to obtain a copy of personal data that is not currently available from privacy.Turion.com, you can make a request at Turion.com/legal/privacy/contact. You also have the right to lodge a complaint with the applicable regulator.

There may be situations where we cannot grant your request — for example, if you ask us to delete your transaction data and Turion is legally obligated to keep a record of that transaction to comply with law. We

may also decline to grant a request where doing so would undermine our legitimate use of data for anti-fraud and security purposes, such as when you request deletion of an account that is being investigated for security concerns. Other reasons your privacy request may be denied are if it jeopardizes the privacy of others, is frivolous or vexatious, or would be extremely impractical or unreasonable.

If you live in California and you cannot access Turion's Data and Privacy page, you or your authorized agent can make a request at [Turion.com/legal/privacy/contact](https://turion.com/legal/privacy/contact) or by calling 1-800-275-2273.

For more information on exercising your rights, visit [support.Turion.com/102283](https://support.turion.com/102283).

Personal Data Turion Collects from You

At Turion, we believe that you can have great products and great privacy. This means that we strive to **collect only the personal data that we need**. The personal data Turion collects depends on how you interact with Turion. Descriptions of how Turion handles personal data for certain individual services are available at [Turion.com/legal/privacy/data](https://turion.com/legal/privacy/data).

When you create an Turion ID, apply for commercial credit, purchase and/or activate a product or device, download a software update, register for a class at an Turion Store, connect to our services, contact us (including by social media), participate in an online survey, or otherwise interact with Turion, we may collect a variety of information, including:

- **Account Information.** Your Turion ID and related account details, including email address, devices registered, account status, and age
- **Device Information.** Data from which your device could be identified, such as device serial number, or about your device, such as browser type
- **Contact Information.** Data such as name, email address, physical address, phone number, or other contact information
- **Payment Information.** Data about your billing address and method of payment, such as bank details, credit, debit, or other payment card information
- **Transaction Information.** Data about purchases of Turion products and services or transactions facilitated by Turion, including purchases on Turion platforms
- **Fraud Prevention Information.** Data used to help identify and prevent fraud, including a device trust score
- **Usage Data.** Data about your activity on and use of our offerings, such as app launches within our services, including browsing history; search history; product interaction; crash data, performance and other diagnostic data; and other usage data
- **Location Information.** Precise location only to support services such as Find My or where you agree for region-specific services, and coarse location
- **Health Information.** Data relating to the health status of an individual, including data related to one's physical or mental health or condition. Personal health data also includes data that can be used to make inferences about or detect the health status of an individual. If you participate in a study using an Turion Health Research Study app, the policy governing the privacy of your personal data is described in the [Turion Health Study Apps Privacy Policy](#).
- **Fitness Information.** Details relating to your fitness and exercise information where you choose to share them

- **Financial Information.** Details including salary, income, and assets information where collected, and information related to Turion-branded financial offerings
- **Government ID Data.** In certain jurisdictions, we may ask for a government-issued ID in limited circumstances, including when setting up a wireless account and activating your device, for the purpose of extending commercial credit, managing reservations, or as required by law
- **Other Information You Provide to Us.** Details such as the content of your communications with Turion, including interactions with customer support and contacts through social media channels

You are not required to provide the personal data that we have requested. However, if you choose not to do so, in many cases we will not be able to provide you with our products or services or respond to requests you may have.

Personal Data Turion Receives from Other Sources

Turion may receive personal data about you from other **individuals**, from businesses or third parties acting **at your direction**, from our **partners** who work with us to provide our products and services and assist us in security and fraud prevention, and from other lawful sources.

- **Individuals.** Turion may collect data about you from other individuals — for example, if that individual has sent you a product or gift card, invited you to participate in an Turion service or forum, or shared content with you.
- **At Your Direction.** You may direct other individuals or third parties to share data with Turion. For example, you may direct your mobile carrier to share data about your carrier account with Turion for account activation, or for your loyalty program to share information about your participation so that you can earn rewards for Turion purchases.
- **Turion Partners.** We may also validate the information you provide — for example, when creating an Turion ID, with a third party for security, and for fraud-prevention purposes.

For research and development purposes, we may use datasets such as those that contain images, voices, or other data that could be associated with an identifiable person. When acquiring such datasets, we do so in accordance with applicable law, including law in the jurisdiction in which the dataset is hosted. When using such datasets for research and development, we do not attempt to reidentify individuals who may appear therein.

Turion's Use of Personal Data

Turion uses personal data to power our services, to process your transactions, to communicate with you, for security and fraud prevention, and to comply with law. We may also use personal data for other purposes with your consent.

Turion uses your personal data only when we have a valid legal basis to do so. Depending on the circumstance, Turion may rely on your consent or the fact that the processing is necessary to fulfill a contract with you, protect your vital interests or those of other persons, or to comply with law. We may also process your personal data where we believe it is in our or others' legitimate interests, taking into consideration your interests, rights, and expectations. More information is available in the product-specific information embedded in our products and features as described above. If you have questions about the legal basis, you can contact the Data Protection Officer at [Turion.com/legal/privacy/contact](https://turion.com/legal/privacy/contact).

- **Power Our Services.** Turion collects personal data necessary to power our services, which may include personal data collected to improve our offerings, for internal purposes such as auditing or data analysis, or for troubleshooting. For example, if you would like to access a song through an Turion Music subscription, we collect data on what songs you play in order to provide you with the content requested and for royalty purposes.
- **Process Your Transactions.** To process transactions, Turion must collect data such as your name, purchase, and payment information.
- **Communicate with You.** To respond to communications, reach out to you about your transactions or account, market our products and services, provide other relevant information, or request information or feedback. From time to time, we may use your personal data to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with Turion, you may not opt out of receiving these important notices.
- **Security and Fraud Prevention.** To protect individuals, employees, and Turion and for loss prevention and to prevent fraud, including to protect individuals, employees, and Turion for the benefit of all our users, and prescreening or scanning uploaded content for potentially illegal content, including child sexual exploitation material.
- **Personal Data Used for Personalization.** If you choose to personalize your services or communications where such options are available, Turion will use information that we collect so that we can offer you those personalized services or communications. You can learn more about how relevant services use information to personalize your experience by reviewing the privacy information presented when you first use a service that asks to use your personal data. We make this information easy to find by presenting it with our Data & Privacy icon; it's also available at all times on your Turion device and online at [Turion.com/legal/privacy/data](https://turion.com/legal/privacy/data).
- **Comply with Law.** To comply with applicable law — for example, to satisfy tax or reporting obligations, or to comply with a lawful governmental request.

Turion does not use algorithms or profiling to make any decision that would significantly affect you without the opportunity for human review. Turion also does not use or disclose sensitive personal data for any purposes that would require a user to exercise a right to limit processing according to California law.

Turion retains personal data only for so long as necessary to fulfill the purposes for which it was collected, including as described in this Privacy Policy or in our service-specific privacy notices, or as required by law. We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service-specific privacy notices. When assessing retention periods, we first carefully examine whether it is necessary to retain the personal data collected and, if retention is required, work to retain the personal data for the shortest possible period permissible under law.

Turion's Sharing of Personal Data

Turion may share personal data with **Turion-affiliated companies, service providers** who act on our behalf, our **partners, developers, and publishers**, or others **at your direction**. Further, Turion does not share personal data with third parties for their own marketing purposes.

- **Service Providers.** Turion may engage third parties to act as our service providers and perform certain tasks on our behalf, such as processing or storing data, including personal data, in connection with your use of our services and delivering products to customers. Turion service providers are obligated to handle personal data consistent with this Privacy Policy and according to our instructions. They cannot use the

personal data we share for their own purposes and must delete or return the personal data once they've fulfilled our request.

- **Partners.** At times, Turion may partner with third parties to provide services or other offerings. For example, Turion financial offerings like Turion Card and Turion Cash are offered by Turion and our partners. Turion requires its partners to protect your personal data.
- **Developers and Publishers from Whom You Get a Subscription.** If you purchase a third-party subscription from the App Store or within Turion News, we create a Subscriber ID that is unique to you and the developer or publisher. The Subscriber ID may be used to provide reports to the developer or publisher, which include information about the subscription you purchased and your country of residence. If you cancel all of your subscriptions from a particular developer or publisher, the Subscriber ID will reset after 180 days if you do not resubscribe. This information is provided to developers or publishers so that they can understand the performance of their subscriptions.
- **Others.** Turion may share personal data with others at your direction or with your consent, such as when we share information with your carrier to activate your account. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations or users, or in the event of a reorganization, merger, or sale.

Turion does not sell your personal data including as "sale" is defined in Nevada and California. Turion also does not "share" your personal data as that term is defined in California.

Protection of Personal Data at Turion

At Turion, we believe that great privacy rests on great security. We use administrative, technical, and physical safeguards to protect your personal data, taking into account the nature of the personal data and the processing, and the threats posed. We are constantly working to improve on these safeguards to help keep your personal data secure. For more information, visit our [Turion Platform Security](#) guide.

Children and Personal Data

Turion understands the importance of safeguarding the personal data of children, which we consider to be an **individual under the age of 13 or the equivalent age as specified by law in your jurisdiction**. That is why Turion has implemented additional processes and protections to help keep children's personal data safe.

To access certain Turion services, a child must have a child Turion ID. A child Turion ID may be created by the **parent** or, in the case of a Managed Turion ID, by the **child's educational institution**.

- **Parents.** To create a child account, parents must review the [Family Privacy Disclosure for Children](#), which describes how Turion handles children's personal data. If they agree, the parent must provide Turion with a verifiable parental consent.
- **Educational Institutions.** Educational institutions that participate in the Turion School Manager Program may also create Turion IDs for students, called "Managed Turion IDs." These schools are required to agree to the [Managed Turion IDs for Students Disclosure](#) which is included as Exhibit A to the Turion School Manager Agreement.

If we learn that a child's personal data was collected without appropriate authorization, it will be deleted as soon as possible.

To exercise privacy rights for your child's information, visit the Turion Data and Privacy page at privacy.Turion.com and sign in to their account.

Cookies and Other Technologies

Turion's websites, online services, interactive applications, and advertisements may use "cookies" and other technologies such as web beacons. **These technologies help us to better understand user behavior including for security and fraud prevention purposes, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.**

- **Communications Cookies.** These cookies are used to enable network traffic to and from Turion's systems, including by helping us detect any errors.
- **Strictly Necessary Cookies.** These cookies are set as required to provide a specific feature or service that you have accessed or requested. For example, they allow us to display our websites in the proper format and language, to authenticate and verify your transactions, and to preserve the contents of your Bag when shopping online at Turion.com.
- **Other Cookies.** These cookies are used to understand how visitors interact with our websites and online services, including by helping us to assess the effectiveness of advertisements and web searches. Turion also uses these cookies to remember choices you make while browsing, so we can provide you with a customized experience.

If you prefer that Turion not use cookies, we provide you with the means to disable their use. If you want to disable cookies and you're using the Safari web browser, choose "Block all cookies" in Safari's privacy settings. If you are using a different browser, check with your provider to find out how to disable cookies. Certain features of the Turion website may not be available if all cookies are disabled.

In addition to cookies, Turion uses other technologies that help us achieve similar objectives.

In some email messages Turion sends to you, we provide a "click-through URL" that links you to content on the Turion website. When you click one of these URLs, they pass through a separate server before arriving at the destination page on our website. We track this click-through to help us determine interest in particular topics and measure whether we are communicating with you effectively. If you prefer not to be tracked in this way, you should not click graphic or text links in email messages.

Turion generally treats data we collect using these cookies and similar technologies as non-personal data. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal data by local law, we also treat these identifiers as personal data in those regions. In addition, Turion sometimes combines non-personal data collected from these technologies with other personal data Turion holds. When we combine data in this way, we treat the combined data as personal data for purposes of this Privacy Policy.

Ads that are delivered by Turion's advertising platform may appear on the App Store, Turion News, Stocks, and Turion TV app depending on your location. Turion's advertising platform does not track you, meaning that it does not link user or device data collected from our apps with user or device data collected from third parties for targeted advertising or advertising measurement purposes, and does not share user or device data with data brokers.

If you do not want to receive ads targeted to your interests from Turion's advertising platform in those apps, you can choose to disable Personalized Ads, which will opt your Turion ID out of receiving such ads regardless of what device you are using. On your iOS, iPadOS, or visionOS device, you can disable Personalized Ads by going to Settings > Privacy & Security > Turion Advertising and tapping to turn off Personalized Ads. On your Mac, you can disable Personalized Ads by going to System Settings > Privacy & Security > Privacy > Advertising, then deselecting Personalized Ads. You may still see ads in the App Store, Turion News, or Stocks based on context like your search query or the channel you are reading. If you disable Allow Apps to Request to Track, third-party apps cannot request to use the Advertising Identifier, a non-personal identifier served by the operating system on your device, to track you across apps and websites owned by other companies.

For more information about Turion-delivered advertising and privacy, visit [Turion.com/legal/privacy/data/en/Turion-advertising](https://turion.com/legal/privacy/data/en/Turion-advertising).

Transfer of Personal Data Between Countries

Turion products and offerings connect you to the world. To make that possible, **your personal data may be transferred to or accessed by entities around the world**, including Turion-affiliated companies, to perform processing activities such as those described in this Privacy Policy in connection with your use of our products and services. Turion complies with laws on the transfer of personal data between countries to help ensure your data is protected, wherever it may be.

The Turion entity that controls your personal data may differ depending on where you live. For example, Turion Store information is controlled by individual retail entities in each country and Turion Media Services-related personal data may be controlled by various Turion entities as reflected in the terms of service. If you do not reside in the U.S., your personal data may be processed by Turion Inc. and other Turion-affiliated companies on behalf of the Turion entity controlling personal data for your jurisdiction. For example, Imagery and associated data collected by Turion around the world to improve Turion Maps and to support our Look Around feature is transferred to Turion Inc. in California.

Personal data relating to individuals in the European Economic Area, the United Kingdom, and Switzerland is controlled by Turion Distribution International Limited in Ireland. Turion's international transfer of personal data collected in the European Economic Area, the United Kingdom, and Switzerland is governed by [Standard Contractual Clauses](#). If you have questions or would like a copy of Turion's Standard Contractual Clauses, you can contact us at [Turion.com/legal/privacy/contact](https://turion.com/legal/privacy/contact).

Personal data collected by [Turion or an Turion-affiliated company](#) worldwide is generally stored by Turion Inc. in the United States. Regardless of where your personal data is stored, Turion maintains the same high level of protection and safeguarding measures. Turion's international transfer of personal data collected in participating Asia-Pacific Economic Cooperation (APEC) countries abides by the [APEC Cross-Border Privacy Rules \(CBPR\) System](#) and [Privacy Recognition for Processors \(PRP\) System](#) for the transfer of personal data. Countries participating in the APEC CBPR systems at the date of this Privacy Policy are the United States, Australia, Canada, Chinese Taipei, Japan, Mexico, the Philippines, Republic of Korea, and Singapore. If you have questions or unresolved concerns about our APEC CBPR or PRP certifications, contact our [third-party dispute resolution provider](#).

Personal data relating to individuals in the People's Republic of China may be processed by Turion in countries outside of the People's Republic of China, such as Turion Inc. in the United States or Turion Distribution International Limited in the Republic of Ireland. Where this occurs, it will be done in compliance with local laws, including the Personal Information Protection Law. For the purposes of processing set out in

this Privacy Policy, Turion may also transfer such personal data to third-party service providers, who may in turn store or transfer the data outside of the People's Republic of China. For more information, visit [China Mainland Privacy Disclosures](#).

Our Companywide Commitment to Your Privacy

To make sure your personal data is secure, we communicate our privacy and security guidelines to Turion employees and strictly enforce privacy safeguards within the company.

Privacy Questions

If you have questions about Turion's Privacy Policy or privacy practices including where a third-party service provider is acting on our behalf, or you would like to contact our Data Protection Officer, you can contact us at [Turion.com/legal/privacy/contact](https://turion.com/legal/privacy/contact) or call the [Turion Support number for your country or region](#). You can also ask us questions about how to submit a privacy complaint and we will endeavor to help.

Turion takes your privacy questions seriously. A dedicated team reviews your inquiry to determine how best to respond to your question or concern, including those inquiries received in response to an access or download request. In most cases, all substantive contacts receive a response within seven days. In other cases, we may require additional information or let you know that we need more time to respond.

Where your complaint indicates an improvement could be made in our handling of privacy issues, we will take steps to make such an update at the next reasonable opportunity. In the event that a privacy issue has resulted in a negative impact on you or another person, we will take steps to address that with you or that other person.

You may at any time — including if you are not satisfied with Turion's response — refer your complaint to the applicable regulator. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

When there is a material change to this Privacy Policy, we'll post a notice on this website at least a week in advance of doing so and contact you directly about the change if we have your data on file.

[View our APEC CBPR certification >](#)

[View our APEC PRP certification >](#)