

## **ZURU PRIVACY POLICY**

Last updated: May 2018

ZURU is committed to safeguarding your privacy online. It is very important to us that you should be able to use and enjoy our websites without having to worry about your privacy.

This policy is designed to help understand how your personal information will be treated. It is important that you read this policy along with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This policy may change from time to time, so please check back regularly.

### **1. About this Privacy Policy**

This Privacy Policy ("Privacy Policy") describes the personal information that may be collected and processed by us, what we use your personal information for, when we might disclose your personal information, the choices you can make about your personal information and how we handle your information.

This Privacy Policy applies to all ZURU websites (however accessed and/or used), whether via personal computers, mobile devices, or other technology ("Device") and other interactive features, applications or downloads that are operated by us that are available through these websites and contain this Privacy Policy (collectively "Website") produced and maintained by ZURU. By using the Website, you acknowledge that you've read and understood this Privacy Policy.

### **2. Who We Are**

ZURU is made up of different legal entities and is issued on behalf of the companies in the ZURU Group. ZURU includes any and all of their subsidiaries and affiliated companies and are referred to in this policy as "we", "our" or "us".

### **3. Collection of Personal Information**

Personal information is information about an identifiable individual, or an individual who is reasonably identifiable whether the information is true or not.

#### What we Collect

We collect information that is directly related to the products and services you choose. The kind of personal information we collect can include: basic contact

details (name, postal address, telephone number, and/or e-mail), demographic details such as age and/or gender, and products you are interested in.

Generally, we will collect personal information directly from you, and only to the extent necessary to provide the product or service you requested or to carry out our internal administrative operations. We may collect personal information from you when you:

- fill in an application form;
- deal with us over the telephone or through any Device;
- purchase a product;
- e-mail us;
- submit your personal details through the Website;
- ask us to contact you after visiting the Website; or
- agree to complete an on-line survey.

We may also collect solicited personal information indirectly, through some publicly available sources, or through social media sites, like Facebook, Twitter, Google and other third parties, who disclose to their users that the users' personal information is provided to businesses like ZURU. We will collect personal information from you by lawful and fair means and not in an unreasonable way.

#### Third parties or publicly available sources

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers, such as Google Analytics;
- search information providers such as Google and Bing.
- app store providers, such as the Apple App Store and Google Play

#### **4. Using Personal Information**

We will collect, hold, use and disclose personal information for the purposes of providing or offering goods and services to you, for any purposes that you may

reasonably expect, for any other purpose authorized by law, or for any other purposes with your consent (whether express or implied). This may include disclosures to organizations that provide us with technical and support services, and professional advice.

We use personal information in the following ways to:

- provide you with news and information about our products and services;
- provide, deliver, source, administer, and improve our products and services;
- provide marketing offers through direct marketing, database compilation, market research, data analysis and segmentation, and the processing or creation of other marketing information;
- communicate with you such as responding to queries and complaints;
- send you marketing and promotional material that we believe you may be interested in; or
- seek your feedback for market research purposes. Participation in feedback such as online surveys is completely voluntary and anonymous. It will not be used to gather identifying information about any individual

You may at any time request that we discontinue sending you emails or other communications.

Your personal information may also be used and disclosed to protect our rights or property and that of our users and, where appropriate, to comply with legal processes, which may include disclosures to law enforcement, regulatory or government agencies.

#### Direct marketing

From time to time we may use the personal information we collect from you to identify particular products and services which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. Every directly addressed marketing contact sent or made by ZURU will include a means by which you may unsubscribe (or opt out) of receiving further marketing information.

Further, you may instruct us at any time to remove any previous consent you provided to receive marketing communications from us. Requests should be directed to Customer Service - see Contact Us.

#### Entrants in Competitions, Contests and Sweepstakes

We may offer competitions, sweepstakes and contests through the Website that may require registration. By participating in a competition, contest or sweepstake, you agree to the terms, conditions and/or official rules that govern that particular

promotion. If you choose to enter a competition, sweepstake or contest, we may disclose personal information to third parties or the public in connection with the administration of such competition, contest or sweepstake, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the official rules, such as on a winners' list.

### Job Candidates

We collect information from job candidates. This information will contain personal information such as name, address, employment history and referee details.

Generally, we will collect personal information directly from the job candidate but some information may be provided by third parties providing human resource services. Job candidate personal information will be used for recruitment purposes and to evaluate the job candidate's application. Where we wish to use the information for other purposes we will seek your agreement beforehand.

## **5. Disclosure**

We do not disclose personal information to third parties unless we are permitted to do so by law or you have given us your consent to do so.

## **6. Accessing and checking the personal information we hold about you**

You have the right to request access to the personal information we hold about you. This right is subject to certain exceptions (see below) allowed by law. The file containing your personal information will be kept on our servers and those of our service providers.

### Exceptions

Your right to access your personal information is not absolute. In some circumstances, the law permits us to refuse your request to provide you with access to your personal information. Such circumstances may include where:

- access would pose a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of others;
- the request is frivolous;
- the information relates to a commercially-sensitive decision-making process;
- access would be unlawful;
- access may prejudice enforcement activities, a security function or commercial negotiations.

## **7. Security**

ZURU is committed to keeping your trust by protecting and securing your

personal information. We have in place reasonable commercial standards of technology and operational security to protect all personal information provided to us from misuse, interference, loss, unauthorized access, modification or disclosure.

We limit access to personal information to individuals with a business need consistent with the reason the information was provided. We keep personal information only for as long as it is required for business purposes or by the law.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Other Information Collected**

We may also collect certain anonymous data regarding your visit to our sites.

### Information collected automatically

We may collect information automatically such as browser type, operating system, and web pages visited to help us manage our Website.

We use cookies (see below) and other internet technologies to manage the Website and certain online products and services. Our internet server logs the following information which is provided by your browser for statistical purposes only:

- the type of browser and operating system you are using;
- your Internet Service Provider and top level domain name (for example - .com, .gov, .au, .uk etc);
- the address of any referring website (for example - the previous website you visited); and
- your computer's IP (Internet Protocol) address (a number which is unique to the machine through which you are connected to the internet).

This information is used by ZURU for aggregated statistical analyses or systems administration purposes only. No attempt will be made to identify users or their browsing activities, except where required by law.

### Cookies

When you interact with us on the internet, our system automatically sends you a 'cookie'. A cookie is a small amount of information sent from a web server to your computer, electronic tablet or smart phone that enables your device to be recognized. It is used to handle your internet sessions on that device and contains a unique identifier.

Other information stored by the cookie includes website traffic data. This data is

not used to identify individual details. We only collate the data into anonymous results in order to evaluate and improve our internet user ability and services. You may disable cookies using your browser's preferences, but some features of the Website may not function if you do so.

### Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## **9. Location of your personal information**

ZURU is a global company, and the personal Information that we collect from you will be transferred to, stored at, or processed in in our offices around the world. As such, our website, the servers that make our website available, and databases where we house information may be located in countries with privacy laws that differ from where you live. We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

By using our Services, the transfer, collection, processing and use of data will occur as specified in this Privacy Statement, our Terms and Conditions, and any other terms provided at the time of collection. If you do not wish to consent to the transfer, collection, processing, or use of this data according to these terms, we ask that you do not visit our websites and/or use our online services. If you wish to ensure that any data previously collected about you is deleted, please write us at [dataprivacy@zuru.com](mailto:dataprivacy@zuru.com).

## **10. How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the

amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only

applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [dataprivacy@zuru.com](mailto:dataprivacy@zuru.com).

## **12. Contact Us**

To contact us with a query, complaint or a privacy question, visit: <http://www.zuru.com/zuru-feedback/> or write [dataprivacy@zuru.com](mailto:dataprivacy@zuru.com). A member of our Customer Service team will respond to you within a reasonable time frame.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **13. Changes to This Policy**

We will post changes to the Privacy Policy and publish the effective date when this policy is updated.

## **14. Safety on the Internet**

Please remember that whenever you voluntarily give personal information publicly online - for example on message boards, through e-mail, or in chat areas - that information can be collected and used by others. If you provide personal information on forums like that - you do so at your own risk.

## **15. Your California Privacy Rights**

California Civil Code Section 1798.83 permits customers of ZURU who are California residents to request certain information regarding its disclosure of their personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [dataprivacy@zuru.com](mailto:dataprivacy@zuru.com). These services will respect your browser's Do Not Track signals (or other well-established, commercially available mechanisms that provide you with the ability to exercise choice regarding the collection of Personal Information). If we receive a Do Not Track notice, we will stop using any Personal Information for online behavioral advertising purposes.

## **16. For Canadian residents**

We may send you marketing communications by e-mail, text message or other electronic means unless you did not opt-in when required or have opted-out from receiving further messages. You may at any time opt out of the use of your personal information for marketing purposes by contacting our Customer Service – see Contact Us above.