

OUR GLOBAL PRIVACY POLICY

This global privacy policy (the "**Privacy Policy**") describes our practices in connection with the personal data that you provide to any company in our Group (a "**Group Company**") or allow a Group Company to access through: (i) a website which is operated (as indicated in its conditions of use) by a Group Company (the "**Website**"); and/or (ii) any other means, such as during a telephone call or by email - which includes whilst contracting with us for, or using, our goods and/or services, etc (the "**Personal Data**"). An updated list of our Group Companies is available [here](#).

Our products and service may have particular privacy terms and conditions attaching to them, which will prevail in the event of any discrepancy with this Privacy Policy (the "**Particular Privacy Terms**"). Any Particular Privacy Terms applicable to a product or service you wish to purchase or use will be highlighted to you at the time you request such product or service.

The third parties' websites you access through the Website fall outside of our control and are not covered by this Privacy Policy but governed by the privacy policies of these third parties' websites that are neither reviewed nor endorsed by us.

1. Updates to this Privacy Policy

We may change this Privacy Policy. If we decide to change our privacy policy, we will post those changes on this page. Please take a look at the "Last updated" legend at the top of this page to see when this Privacy Policy was last revised. The processing of your Personal Data will be governed by the Privacy Policy in force at the time your Personal Data are collected unless otherwise agreed by you or allowed under applicable law.

2. What categories of Personal Data are collected?

When you register with us, we will collect Personal Data such as your name, street address, email address, telephone number. If you contract to purchase goods or services from us or through this Website, we will collect Personal Data such as payment information, including credit card data. In addition, we collect certain information through cookies and similar electronic devices, as further described in the [Cookies](#) section below. We will ask for your consent if we wish to use your data for a purpose materially different than that for which it was collected.

3. Who determines which Personal Data are collected, how and for which purposes (the data controller)?

The data controller ("**us**", "**we**", and "**our**") will be:

- For products or services contracted offline: the Group Company that contracts with you, as identified in the terms and conditions applicable to the purchase or use of the relevant product or service.
- For products and services contracted online:
 - (1) in all events, the Group Company that operates the relevant Website, as identified in its conditions of use; and
 - (2) if you are interested in a specific online product or service (other than mere browsing), the Group Company that contracts with you, as identified in the relevant terms and conditions applicable to the purchase or use of the relevant product or service.

All terms and conditions of our products and service (unless expressly provided for therein), including this Privacy Policy, may be assigned to any third party.

Note: The Group companies include, among others, the US company hibu Inc. hibu Inc. in the US complies with the US-EU Safe Harbor Framework and has certified that it adheres to EU/U.S. Safe Harbor Principles (notice, choice, onward transfer, security, data integrity, access and enforcement) with respect to Personal Data transferred from the European Union by hibu Inc.'s clients, customers and affiliates. More information about the Safe Harbor program can be found at <http://export.gov/safeharbor>.

4. How is your Personal Data collected?

- Directly from you, when you are interacting with a Group Company, for example information you give us as requested by phone, email or detailed in the forms you may be asked to complete and also information we collect from your use of our products and services such as online searches you conduct or your interaction with adverts that we place on websites or other media.
- Directly from third parties: if allowed by law, for example, if you are in the process of contracting for a product or service for which we need to evaluate your financial solvency (e.g., contracts that entail a deferred payment of the price or the provision of a service involving periodic billing), we may check your credit rating or credit score by consulting financial solvency files held by third parties, we may also be passed your data by third parties for one of the purposes specified below. If you reside in the United States, please review the following: [A Summary of Your Rights Under the Fair Credit and Reporting Act](#).

5. Which Personal Data and for which purposes are they used by us?

We collect Personal Data (as detailed in the forms you will be asked to complete) as required to perform the following purposes:

- (1) **To evaluate an application regarding the contracting of our products or services.** For example, depending on the product or service, this may include verifying whether you are eligible to enter into a competition or to check your credit rating or credit score in credit and solvency files managed by third parties, etc.
- (2) **To provide you with a product or service you have requested.** For example, to answer your questions or respond to comments submitted to us; to send you information you have requested; to perform and enforce the terms and conditions that govern the product or service (which may include, depending on the product or service, the recording of calls between us and you to evidence the rendering of the product or service or the identification of activities that are prohibited under the terms and conditions that govern the product or service, for accounting, billing and payment verification purposes, to collect debts, to serve notice of unpaid, due and enforceable debts to solvency files which payment has been requested from you); to award a prize if you are the winner of a competition, to post content you have submitted for publication, such as ratings and reviews; to share your Personal Data with payment processing organizations, etc.

*If the product or service rendered by us requires us to access or otherwise process on your behalf (e.g. developing, testing, hosting and providing maintenance services for your website) personal data controlled by you (e.g. via your online store or advertising website that we create for you), please refer to its **Particular Privacy Terms** regarding your and our specific responsibilities.*

- (3) **To comply with our legal obligations or defend our interests in judicial or administrative proceedings.** For example, this includes responding to the requests of governmental and judicial orders of any competent jurisdiction or sharing the Personal Data with other enforcement agencies regarding any mandatory requirement.
- (4) **To carry out any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock.** For example, this includes a sale of our assets such as our databases, in connection with a bankruptcy proceeding or an intra-group corporate or business reorganization.
- (5) **To analyse how our products and service are used by our customers and to improve our business.** For example, this includes the analysis of statistical information on the use of our websites by visitors as well as of any feedback on our business or testimonials that you may provide. We may (but we are not obliged to) publish any feedback or testimonials (online or offline) and your name in order to promote our business (your user ID may be published, but your e-mail address and other contact details will not be).
- (6) **To honour your preferences on direct marketing and for advert targeting purposes.** We (or other third parties, including our affiliates) may send you direct marketing communications in

accordance with applicable privacy laws, which may or may not be personalised for you (i.e., tailored to your profile), by any means (e.g., post, phone call, email, text message or other electronic means) and carry out advert targeting. *For example, whenever you provide us with any Personal Data (e.g., when you ask for our products or services), we will ask you for your preferences in this respect and provide you with information on the kind of direct marketing available and on whether third party data controllers may send you such direct marketing or carry out the advert targeting.* We will not share any Personal Data with affiliates or other third parties for these purposes without meeting the requirements of privacy laws. To discontinue direct marketing or advert targeting, you may send a request as explained in section 9. Furthermore, and regarding direct marketing by electronic means, we will inform you in each of our communications how to unsubscribe in a straightforward way and at no cost (save that related to transmission of your request). We will answer your request as soon as reasonably practicable, and in any case, within the term legally determined (if there is one).

Please note that if you do opt-out of receiving marketing-related messages from us, we will still send messages as necessary to fulfill other purposes (such as administrative messages relating to the operation of the product or service).

6. Which Personal Data and for which purposes are they shared with third parties?

Personal Data may be used or shared with third parties (including Group Companies) if:

- (i) it is necessary for the following purposes mentioned in section 5 above: **(1) to evaluate an application regarding the contracting of our products or services, (2) to provide you with a product or service you have requested, (3) to comply with our legal obligations or defend our interests in judicial or administrative proceedings; (4) to carry out any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock; and (5) to analyse how our products or services are used by our customers and to improve our business;**
- (ii) it is necessary **(6) to honour your preferences on direct marketing and for advert targeting purposes** (mentioned in section 5 above), i.e., if you have agreed to receiving marketing and targeted adverts from us and/or certain third parties; or
- (iii) these third parties are service providers and work on our behalf to support us in performing any of the abovementioned purposes (e.g., cloud services providers that provide IT infrastructure used by us to provide you with a product or service).

The third party recipients under (i), (ii) or (iii) may be located world-wide, including outside of the European Economic Area (EEA) (such as the US) these countries may provide personal data protection standards that are not necessarily equivalent to those applicable in the EEA (in which case, specific safeguards are adopted by us for Personal Data originating in the EEA, such as ensuring the third party complies with the Safe Harbor Principles, is subject to another adequacy finding or enters into a written agreement with us requiring that the third party provide at least the same level of privacy protection as is required within the EEA).

7. How we keep your Personal Data secure

We take the security of your Personal Data very seriously. We have put in place technology and security policies which are designed to protect the personal information that we hold about you. These cover storing, using and releasing any Personal Data you have provided, and preventing unauthorized access or use. We have put in place technical and organizational measures designed to prevent unauthorized or unlawful processing of Personal Data and designed to prevent accidental access, disclosure, alteration, loss or destruction of, or damage to, Personal Data. These include internal reviews of our data collection, storage, processing and destruction practices. We take steps designed to ensure the reliability of our personnel and subcontractors.

We use an internal self-assessment program to verify that this Privacy Policy is accurate, comprehensive, prominently displayed, implemented and accessible. The self-assessment program is also used to indicate whether or not this Privacy Policy adheres to the Safe Harbor Principles and aims to ensure that

we have in place procedures for training employees regarding implementation and discipline for failure to comply, as well as and periodically conducting objective reviews of compliance with the foregoing.

8. Cookies

We and our business partners collect information about your use of our Websites through cookies. Cookies are information files stored on your computer that help websites remember who you are and information about your visit. In those Websites where cookies are used, you will find a cookie policy which provides detailed information on which cookies are used therein (our cookies and/or third parties' cookies). Without prejudice to other deactivation means that might be made available in each Website, if any, if you do not want a website to create a cookie on your computer, the option to disable it may be activated in your browser (some browsers just completely allow or disallow cookies so you either benefit from them or not; others can also be set to prompt you for a YES or NO response whenever a site tries to send a cookie and newer browsers give more control in selecting which sites can or cannot send cookies). If you want to know more about how cookies work and how to manage or delete them, visit the [All About Cookies website](#) or the [Interactive Advertising Bureau's website](#).

9. Your responsibilities when you provide us with or allow us access to your Personal Data

You must provide accurate Personal Data and do so only when you are 18 years of age or over and you agree to keep such data up-to-date. You must comply with any data protection and privacy legal requirements applicable to you. You must comply with and not disable any security measure of a Website. If you are acting as a (legal or *de facto*) representative of any legal entity, you must only provide your professional contact details in respect of that legal entity (and never your private contact details).

10. Use of the Website by Minors

The Website is not directed to individuals under the age of eighteen (18), and we request that these individuals do not provide Personal Data through the Website.

11. Managing your rights regarding your Personal Data held by us as data controller

You may contact us at privacy.officer@hibu.com with written proof of your identity, such as a copy of your photo ID, with signature) (i) to request a copy of your Personal Data; or (ii) to request that your Personal Data be corrected, amended, rectified or deleted if they are inaccurate or incomplete; or (iii) to object to the processing of your Personal Data for certain purposes (such as direct marketing). If you are a registered user of one or more of our Websites, (i) and (ii) may also be managed directly by you in your account management/your profile section. We will answer your request as soon as reasonably practicable, and in any case, within the term legally determined (if there is one) and will comply except where the burden or expense of providing access would be disproportionate to the risk to you, or compliance could result in someone else's rights being violated.

12. What to do if you have a complaint or concern.

We are committed to resolving any privacy concerns that you may have. If you have any concerns or complaints about the way we've handled your personal information, please contact us at privacy.officer@hibu.com. Should you have a complaint against our US Group Company, we'll try to resolve the complaint directly with you; however, if we are unable to resolve your dispute and you reside in the US, our US Group Company has selected the International Dispute Resolution Center as the independent recourse mechanism to resolve the dispute via arbitration. Additionally, our US Group Company is also subject to the jurisdiction of the U.S. Federal Trade Commission. Individuals who are unable to resolve a US Group Company-related complaint through the aforementioned complaint process may contact the Federal Trade Commission:

Federal Trade Commission
Attn: Consumer Response Center
600 Pennsylvania Avenue NW
Washington, DC 20580
consumerline@ftc.gov
www.ftc.gov

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