

## **WE CARE ABOUT YOUR PRIVACY**

The Paradox Group is committed to protecting your privacy and to comply with applicable data protection and privacy laws. We hope that this Privacy Policy (“Policy”) helps you understand what kind of information we collect in connection with our products and services and how we process such information. Throughout this Policy the term “personal data” means information relating to an identified or identifiable individual (i.e. a natural person). “The Paradox Group” refers to The Paradox Group, including its affiliates (also referred to as “we”, “us”, or “our”).

This Policy applies to personal data collected in connection with products and services offered by The Paradox Group or from other interactions with us where a link or other reference of incorporation to this Policy is made, for example, in connection with our devices and accessories, websites (also including mobile websites), games, music and other types of services offered by The Paradox Group typically in electronic form, as well as other services such as customer care and warranty services or promotions and campaigns.

We may provide additional or amending privacy information in connection with a particular The Paradox Group product or service. Such information prevails over this Policy to the extent of any conflict. Our products or services may contain links to other companies’ websites and other third party services that have privacy policies of their own. We recommend that you read the privacy policies of such services. The Paradox Group is not responsible for the privacy practices or contents of any such services.

**By using this website and/or by submitting personal data to The Paradox Group, you express your agreement to the processing of your personal data in the manner provided in this Policy. If you do not agree with this Policy, please do not use this website or provide The Paradox Group with your personal data.**

### **The Data We Collect**

We collect your personal data typically when you make a purchase, use or register into our services, enter into a sales promotion or a campaign or otherwise interact with us. We endeavour to collect personal data only with your knowledge or consent. Below are examples of the categories of data collected.

**Technical Information** For the most part, you may visit our websites or use our products or services without having to tell us who you are. However, certain technical information is normally collected as a standard part of your use of our services. Such information includes, for example, your IP-address, access times, the website you linked from, pages you visit, the links you use, the ad banners and other content you viewed, information about your devices and other such technical information your browser provides us with or as may be otherwise collected in connection with certain products and services. When you use our services or otherwise interact with us over telecommunications networks, certain additional information, such as your mobile subscription number, may be transmitted to us by the telecommunications operator as a standard part of that communication. Please also see the section “Use of Cookies and Web Beacons” below.

## **Information you provide us with**

When you register for our services, make a purchase, enter a sales promotion or otherwise interact with us, we may ask you to provide us with information such as your name, email address, street address, as well as user names, passwords and other such credentials that are used to authenticate users and to validate their actions or that may be needed to provide you with the products and services you have requested or to communicate with you.

We may collect demographic information, for example, your age, gender, postal code and language preferences.

We may also collect other information you provide, such as your consents, preferences and feedback, information relating to your devices and other such information you provide us with. Please note that certain non identifiable information collected from you may become personally identifiable when you provide us with your personal data. We may also obtain, in accordance with applicable law, some personal data from list-rental companies and other such publicly available sources. Some of our services may allow you to submit information about other people, for example, if you make an order for a product that you wish us to send directly to another recipient.

**Your transactions with us** We collect or ask for information relating to your purchase and/or use of our products and/or services and your other interactions with us. Such information may include, for example, details of the queries or requests you have made, the products and services provided (including delivery details), financial details (including payments made, credit card details, billing address, credit checks and other such financial information), details of agreements between you and The Paradox Group, records of contacts and communications, information and details relating to the content you have provided us with and other such transactional information. We may, in accordance with applicable law, record your communication with our customer care or with other such contact points. Certain services may involve the use of your location data. However, use of your location data for such services is subject to your consent.

## **The Purposes for which We Process Your Personal Data**

The Paradox Group processes your personal data for the purposes described in this Policy and/or any additional service specific privacy information. Please note that one or more purposes may apply simultaneously.

**Provision of products and services** We may use your personal data to fulfil your requests, process your order or as otherwise may be necessary to perform or enforce the contract between you and The Paradox Group, to ensure the functionality and security of our products and services, to identify you and to prevent and investigate fraud and other misuses.

**Development of products and services** We may use your personal data to develop our products and/or services. However, for the most part we only use aggregate and statistical information in the development of our products and services. We may also use your personal data to personalize our offering and to provide you with service more relevant to you, for example, to make recommendations and to display customized content and advertising in our websites. We may combine personal data collected in connection with your use of a particular The Paradox Group product and/or service with other personal data we may hold about you, except where such personal data was collected for a different purpose. We may create aggregate and statistical information based on your personal data.

**Communicating with you and marketing** We may use your personal data to communicate with you, for example, to provide information relating to our products and/or services you are using or to contact you for customer satisfaction queries. We may use your personal data for marketing or research purposes, for example, to conduct market research and we may, in accordance with applicable law, contact you to inform you of new products, services or promotions we may offer. Also, some of our products and services may be used to promote products and services of other companies. However, The Paradox Group does not disclose your personal data to such companies or any other company for marketing purposes without your prior consent.

### **Sharing Your Personal Data**

Generally, we do not sell, lease, rent or otherwise disclose your personal data to third parties unless otherwise stated below.

**Consent** We may share your personal data if we have your consent to do so. Some services may include sharing your personal data with other users of the service, for example services where users publish their own content or The Paradox Group user communities.

**The Paradox Group companies and authorized third parties** We may share your personal data with other The Paradox Group companies or authorized third parties who process personal data for The Paradox Group for the purposes described in this Policy. Such parties are not permitted to use your personal data for other purposes, and we require them to act consistently with this Policy and to use appropriate security measures to protect your personal data.

**International transfers** Our products and services may be provided using resources and servers located in various countries around the world. Therefore your personal data may be transferred across international borders outside the country where you use our services, including to countries outside the European Economic Area (EEA ) that do not have laws providing specific protection for personal data or that have different legal rules on data protection, for example, the United States of America.

In such cases we take steps to ensure that there is a legal basis for such a transfer and that adequate protection for your personal data is provided as required by applicable law, for example, by using standard agreements approved by relevant authorities (where necessary) and by requiring the use of other appropriate technical and organizational information security measures

**Mandatory disclosures** We may be obligated by mandatory law to disclose your personal data to certain authorities or other third parties, for example, to law enforcement agencies in the countries where we or third parties acting on our behalf operate. We may also disclose and otherwise process your personal data in accordance with applicable law to defend The Paradox Group's legitimate interests, for example, in civil or criminal legal proceedings.

**Mergers and Acquisitions** If we decide to sell, buy, merge or otherwise reorganise our businesses in certain countries, this may involve us disclosing personal data to prospective or actual purchasers and their advisers, or receiving personal data from sellers and their advisers.

### **Collecting the Data of Minors**

The Paradox Group does not seek to collect any information from or engage in any transactions with persons under the age of 13. Our databases may nevertheless contain personal data of children under 13 due to the fact that it is not always possible to determine precisely the age of the user. Insofar as we ask you to provide your age, we block the service from any person who is under 13

years of age. We will also make reasonable efforts to clear our databases of personal data relating to under age users.

The Paradox Group's policy is to request that minors (the legal age of majority and therefore the age of minors is determined by local law where you reside) do not make purchases or engage in other legal acts on our products and services without the consent of a parent or legal guardian, unless otherwise permitted by applicable law.

### **Data Quality**

We take reasonable steps to keep the personal data we possess accurate and up-to-date and to delete out of date or otherwise incorrect or unnecessary personal data.

As certain The Paradox Group products and services may allow you to manage your profile, we encourage you to access your personal data from time to time to ensure that it is correct and up-to-date. Please remember that it is your responsibility to provide us with correct details as well as to update the personal data you have provided us with in case of any changes.

### **Security**

While there are always risks associated with providing personal data, whether in person, by phone, via the internet or otherwise, and no technology is completely safe or "tamper" or "hacker" proof, The Paradox Group takes appropriate technical and organizational information security measures to prevent and minimize such risks.

Such measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights management systems and processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your personal data against unauthorized use or disclosure. Where appropriate, we may also take backup copies and use other such means to prevent accidental damage or destruction to your personal data. If a particular part of a The Paradox Group website supports online transactions, we will use an industry standard security measure, such as the one available through "Secure Sockets Layer" ("SSL"), to protect the confidentiality and security of online transactions.

### **Use of Cookies and Web Beacons**

From time to time when you visit a The Paradox Group website, information may be placed on your computer to allow us to recognize your computer. This information is commonly in the form of a text file known as a "cookie". Cookies are small pieces of data stored on your computer's hard drive, rather than on the website. Typically, they enable collection of certain information about your computer, including your internet protocol (IP) address, your computer's operating system, your browser type and the address of any referring sites.

Our use of cookies is intended to provide benefits to you, such as eliminating the need for you to enter your password frequently during a session or the need to re-enter items you place in a shopping cart if you do not finish a transaction in a single visit. Cookies are also used for website traffic analysis and anonymous demographic profiling so that we may improve our services.

The Paradox Group may use so called web beacons (or "pixel tags") in connection with some websites. However, we do not use them to identify individual users personally. Web beacons are typically graphic images that are placed on a website and they are used to count visitors to a website and/or to access certain cookies. This information is used to improve our services. Web beacons do

not typically collect any other information than what your browser provides us with as a standard part of any internet communication. If you turn off cookies, the web beacon will no longer be able to track your specific activity. The web beacon may, however, continue to collect information of visits from your IP-address, but such information will no longer be unique.

If you do not wish to receive cookies, or want to be notified before they are placed, you may set your web browser to do so, if your browser so permits. Please understand that if cookies are turned off, you may not be able to view certain parts of this site that may enhance your visit. Some of our business partners whose content is linked to or from this site may also use cookies or web beacons. However, we have no access to or control over these cookies.

## **Your Rights**

In case you wish to know what personal data we hold about you or you wish to replenish, rectify, anonymize or delete any incomplete, incorrect or outdated personal data, or you wish us to cease processing your personal data for the purpose of sending promotional materials or direct marketing or for the performance of market research or on other compelling legal grounds, you may, as appropriate and in accordance with applicable law, exercise such rights by contacting us through the contact points referred to below. In some cases, especially if you wish us to delete or cease the processing of your personal data, this may also mean that we may not be able to continue to provide the services to you. We encourage you to use available profile management tools for the above purposes as such tools often provide you with direct access to your personal data and allow you to effectively manage it.

Please note that The Paradox Group may need to identify you and to ask for additional information in order to be able to fulfil your above request. Please also note that applicable law may contain restrictions and other provisions that relate to your above rights.

## **The Controller of Your Personal Data and Contact Details**

In addition, The Paradox Group affiliate providing the product or service may be a controller of your personal data. You may find the identity of the controller and its contact details by reviewing the terms and conditions of such a product or service or by using contact information provided in the applicable The Paradox Group websites.

## **Changes to This Privacy Policy**

The Paradox Group may from time to time change this Privacy Policy or change, modify or withdraw access to this site at any time with or without notice. However, if this Privacy Policy is changed in a material, adverse way, The Paradox Group will post a notice advising of such change at the beginning of this Policy and on this site's home page for 30 days. We recommend that you revisit this Privacy Policy from time to time to learn of any such changes to this Privacy Policy.