

THEO Privacy Policy

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

1. What personal information do we collect from the people that visit our blog, website or app?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address or other details to help you with your experience.

2. When do we collect information?

We collect information from you when you register on our site, place an order, subscribe to a newsletter, respond to a survey, fill out a form, Use Live Chat, Open a Support Ticket or enter information on our site.

Provide us with feedback on our products or services

3. How do we use your information?

We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.
- To improve our website in order to better serve you.
- To allow us to better service you in responding to your customer service requests.
- To quickly process your transactions.
- To send periodic emails regarding your order or other products and services.
- To follow up with them after correspondence (live chat, email or phone inquiries)

4. How do we protect your information?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.



All transactions are processed through a gateway provider and are not stored or processed on our servers.

5. Do we use 'cookies'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We use cookies to:

Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly. It won't affect the user's experience that make your site experience more efficient and may not function properly.

6. Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information.

7. Third-party links

We do not include or offer third-party products or services on our website.

8. Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. https://support.google.com/adwordspolicy/answer/1316548?hl=en

We use Google AdSense Advertising on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We have implemented the following:

- Remarketing with Google AdSense
- Google Display Network Impression Reporting
- Demographics and Interests Reporting
- DoubleClick Platform Integration



We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

9. How does our site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

10. Does our site allow third-party behavioral tracking?

It's also important to note that we allow third-party behavioral tracking

11. Fair Information Practices

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify the users via in-site notification

• Within 7 business days

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute noncompliance by data processors.



ADDENDUM TO THE PRIVACY POLICY

1. Introduction

This Addendum is effective as of December 1, 2018.

This Privacy Statement explains how THEO Technologies NV (hereinafter referred to as "THEO", "We", "Our", or "Us") processes (e.g. collect, use, store, process, disclose and delete) Personal Data. This Privacy Statement applies to information that you provide directly to Us through websites operated by Us, accessed through Our social media pages as well as through e-mail messages (or other forms of correspondence) We exchange with you.

If you have questions or concerns regarding this Privacy Statement or our handling of your information collected under this Privacy Statement, contact contact@theoplayer.com.

"Personal Data" has the meaning set out in the EU Regulation 2016/679 or local implementation laws, where relevant and applicable. This definition includes, but is not limited to: name & last name; email address; postal address; phone number; fax number; bank information; and credit or debit card number.

2. How We Collect Personal Data

a. Provided by you

We may collect Personal Data you provide directly to Us via websites, e-mail, EDI, and other interactions such as your registration on Our systems as a customer, your purchase orders, participation to Our events, etc.

b. Website

When you visit Our websites, We automatically receive information about which of our websites you are visiting and the browser you are using. We will use this information to improve our services and to make Our websites more user-friendly as well as for statistical purposes. We may also use cookies to help Us improve Our services for you.

3. How We Use Information We Collect

We may use information about you for the following purposes:

- To provide, maintain, protect and improve our services, develop new services, and protect Our and Our users' legitimate interests;
- To facilitate, manage, personalize and improve your online experience;
- To respond to your inquiries and fulfill your requests, such as send you newsletters, brochures, catalogs and e-mails;
- For Our business purposes, such as data analysis, audits, fraud monitoring and prevention, enhancing, improving, or modifying Our services, identifying usage trends, and operating and expanding Our business activities;
- To send you advertisements and communicate with you about products, services, offers, promotions, and events We believe may be of interest to you.

If you contact Us, We may store any written/email correspondence between you and Us. We use this information to respond to your queries, to provide Our services and to improve Our future services.



In the above cases the legal basis for the collection and processing of Personal Data is that it is necessary for the purposes of the legitimate interests pursued by Us.

4. Authorities and Rights

We may also share information about you as necessary to (a) comply with a legal obligation to provide certain data to authorities; (b) to respond to requests from public and government authorities, (c) to enforce Our contractual rights; (d) to protect Our operations and protect Our rights, privacy, safety or property, and /or that of you or others; and to allow Us to pursue available remedies or limit the damages that We may sustain.

5. Principles for Processing of Personal Data

We are considered to be a Data Controller in accordance with applicable Data Privacy laws.

However, in case data processing is required by our clients, Personal Data will be collected, stored, processed and transmitted in accordance with applicable laws, rules and regulations. Such processing of Personal Data will be in accordance with the following principles:

- Personal Data will be processed fairly and lawfully;
- Personal Data will be only collected for specified, explicit, and legitimate purposes;
- We will collect adequate level of Personal Data that is relevant, and in a fashion that is not excessive in relation to the purposes for which it is collected;
- Personal Data collected by Us will be accurate and, where necessary, kept up to date as reasonable possible; and
- We will retain Personal Data for no longer than necessary to serve the purposes for which such Personal Data was collected.

6. Security of Personal Data

We seek to comply with legal requirements and use reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We will notify you in the event We become aware of a security breach involving your personally identifiable information stored by or for Us.

7. Access to Personal Data

Subject to the applicable data privacy regulation, you may be entitled to request certain information about the Personal Data We have stored about you and to request certain access to, correction, deletion or blocking of such Personal Data as well as to request restriction of processing or to object to the processing. If you have such a request, please contact <u>contact@theoplayer.com</u>.

8. Our Websites

When using Our websites, you consent to the use of your Personal Data in accordance with this policy.