

PRIVACY STATEMENT BRANDLOYALTY

Version: 9 May 2018

1. Who are we?

Brand Loyalty International B.V. located in the Netherlands and any of its subsidiaries and affiliates, including [IceMobile](#), [Merison](#) and [Edison](#) companies, and all BrandLoyalty Companies (hereafter: 'BrandLoyalty', 'we', 'us', 'our') collect and process data relating to website visitors, app users and (contact persons of) clients, suppliers or other business relations (hereafter together referred to as: 'I', 'me', 'you'). We are responsible for the processing of your personal data as described in this statement, and qualify as 'data controller' under applicable data protection laws.

However, we do not always act as a data controller. We can also process personal data on behalf of our clients, the retailers. This is for instance, the case when you are participant of a loyalty program. For reasons of completeness, we have also added the information we process, on behalf of our clients, when you participate in a loyalty program. Specific data protection conditions imposed by the relevant retailer can apply to the processing of this information. Please also check the privacy statement of the relevant retailer.

2. What do we do?

BrandLoyalty advises on, implements, provides, conducts and measures loyalty programs and provides all necessary related retail (mobile) services. To do this we follow information usage practices based on our beliefs: first, that protecting user privacy is essential to the growth and success of online digital services provided by BrandLoyalty; second, that a personalized digital experience can provide significant benefits to our clients and their consumers if done properly. BrandLoyalty works with all of its clients and suppliers without compromising individual privacy.

3. Purpose of this privacy statement

With this privacy statement, BrandLoyalty aims to inform you how we treat and protect data relating to you and/or your device. Please take some time to read about what our business does by visiting any BrandLoyalty website, learn how we ensure that the data which is shared with us is collected and used safely, again not compromising individual privacy.

BrandLoyalty may occasionally make changes to this Privacy Policy. If we do, we will update the "Last Modified" date above on this Privacy Policy. If we make a material change, such as the ways in which we use personal data, we will notify you via a prominent notice on our website(s).

4. Which categories of (personal) data may BrandLoyalty collect and/or process in relation to me and/or my devices?

BrandLoyalty processes (personal) data in relation to: website visitors, - on behalf of our clients - participants of a loyalty program and (contact persons of) clients, suppliers or other business relations, as further described below (hereafter all data together is referred to as: 'Customer data'). Please find below more information on BrandLoyalty's processing of such data.

I am a visitor of any BrandLoyalty website...

BrandLoyalty collects and processes data relating to you and/or your device if you visit this website or any of our mobile applications.

(Technical) data may be collected and further processed with cookies, log files or similar technologies.

Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer. This allows the server to deliver a page tailored to a particular user, or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website (or related site) to the next (Source: www.whatarecookies.com).

If you visit our website, BrandLoyalty may process the following (technical) data categories:

- browser or device type
- operating system
- domain name
- language preference
- platform type
- access dates and times,
- referring website addresses,
- browsing and search activity

While browsing any BrandLoyalty website, you may choose to provide information to us voluntarily if you interact with the website in certain ways or when using one of our contact forms. We will then process the information that you have provided us with.

Please be aware that in addition to our websites, the sites of our clients and any third party websites linked to one of our sites may also collect information from you for various purposes. Although we choose our business partners and clients carefully, BrandLoyalty is not responsible for the privacy practices of websites

operated by such third parties. You should check the applicable privacy policies of such websites you visit to determine how they handle any information they collect from you.

Google Analytics

BrandLoyalty uses Google Analytics cookies on its websites to obtain information about the quality and effectiveness of our websites. Google will only process cookies and related cookie data on behalf of us, and does not share such data for their own and other services. We therefore have entered into a data processing agreement with Google. As a measure to protect your data, we do not process the last eight digits of your IP-address for this processing.

BrandLoyalty does not receive any data from website visitors via sources other than directly from you and your device. We do not enhance this data with data from public sources.

I participate in a loyalty program...

On behalf of our clients BrandLoyalty may process data of you if you participate in one or more loyalty programs of our clients.

BrandLoyalty may collect and/or process the following data categories about you:

- Personal details
- Contact details
- Loyalty card number or other identification numbers
- Loyalty program information, including transactional data
- Any other personal data provided by you directly, for instance in surveys
- Any personal data whose processing is required pursuant to, or necessary with a view to the application of legislation.

BrandLoyalty may have (partly) received your data from sources other than directly from yourself, i.e. by obtaining information from our clients who we help setting up and/or maintaining any loyalty program, intermediary parties, market research companies and social media companies.

I am (a contact person of) a client, supplier or other business relation...

BrandLoyalty collects and processes data relating to persons who work with BrandLoyalty such as clients, suppliers or other business relations.

BrandLoyalty may process the following data categories about you:

- Personal details
- Contact details

- **Company details**
- **Any other personal data provided by you directly;**
- **Any personal data whose processing is required pursuant to, or necessary with a view to the application of legislation.**

BrandLoyalty may have (partly) received your data from other sources besides directly from you, i.e. by obtaining information from the local Chamber of Commerce or to do other (legal) checks to prevent corruption, identity theft, financial fraud, money laundering and/or terrorist financing (Know Your Customer procedures).

5. For which purposes does BrandLoyalty process my Customer data?

BrandLoyalty collects and processes Customer data described above for multiple purposes, which can be subdivided as follows:

No.	Purpose	One of the following legal bases
1	<ul style="list-style-type: none"> • For our loyalty program purposes; • Data validation, enhancement, information verification and suppression; • To comply with applicable laws and regulations or to respond to a lawful request for information received by us, whether or not a response is required by applicable law; • To enforce our terms of use and other agreements or to protect our rights; • To protect the safety of members of the public and users of the service; • Reporting. 	<ul style="list-style-type: none"> • Your consent • Legitimate interest of BrandLoyalty: i.e. to conduct core business activities / to facilitate regular business activities; • Necessary to fulfil legal requirement applicable to BrandLoyalty; • Necessary for performance contract between you and BrandLoyalty (or take pre-contractual arrangements).
3	<i>Especially with regards to (technical) data including cookies:</i>	<ul style="list-style-type: none"> • Legitimate interest of BrandLoyalty: i.e. to facilitate its regular business activities.

	<ul style="list-style-type: none"> • enhancement of our services; • marketing, and more effectively match applications and website contact to your interests to simplify login and to facilitate secure navigation through the password protected areas of the website(s); • With regards to Google Analytics: to obtain information about the quality and effectiveness of our delivered information society services. 	
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Please be aware that the processing of the data categories for the purposes, as mentioned above, are based on one of the legal bases mentioned (depending upon the specific data category and sub purpose at stake), and not all legal bases simultaneously.

6. Who may receive my data from BrandLoyalty?

BrandLoyalty will only share Customer Data for limited purposes such as those provided in this Privacy Policy. This may include sharing information (1) to enable third party service providers to assist or facilitate in the services we provide to our clients; (2) to comply with applicable laws and regulations or to respond to a lawful request for information received by us, whether or not a response is required by applicable law; (3) to enforce our terms of use and other agreements or to protect our rights; (4) to protect the safety of members of the public and users of the service; (5) with other BrandLoyalty entities and clients for our loyalty program purposes; (6) with vendors, administrative service providers, technology providers, and carefully selected partners for services including, but not limited to, data validation, enhancement, information verification and suppression services; or (7) for any other purpose for which you provide up front consent.

Please find below a schedule with the (types of) partners we use:

Type of recipient
You (in your personal account or when requested access)
Other BrandLoyalty-entities and/or its subsidiaries and affiliates

Provider of an accountancy program
Provider of an e-mail service
Provider of financial administration
Provider of administration software
CRM provider
Provider of data sharing tool
Provider of KYC-system
Third party marketing partners
Business partners
Clients
Publishers

While BrandLoyalty strongly encourages and where possible commits its clients and partners to adopt responsible approaches to the gathering and storage of personal data, BrandLoyalty is not responsible for the information practices of such clients and partners.

In the event that BrandLoyalty is acquired by or merged with a third party, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from you as part of such merger, acquisition, sale, or other change of control. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your information is treated, transferred, or used.

7. Does BrandLoyalty protect my Customer Data?

The security of your information is important to us. We have implemented appropriate (technical and organizational) security measures to protect the information in our care, both in transit and at rest. We take technical and organizational security measures to protect our data from unauthorized access, as well as unauthorized disclosure or destruction of data. No transmission of data over the Internet is guaranteed to be completely secure. While we strive to protect your data, it may be possible for third parties not under the control of BrandLoyalty to unlawfully intercept or access transmissions or private communications. Unauthorized entry or use, hardware or software failure, and other factors may compromise data security. BrandLoyalty cannot ensure or warrant the security of information you transmit to us. You acknowledge and assume this risk when communicating with BrandLoyalty. BrandLoyalty will inform you in case of a data security breach if required by applicable law or otherwise considered feasible in our opinion.

Our philosophy on privacy at BrandLoyalty follows the framework of Privacy by Design. We integrate privacy in strategy, our loyalty program set up for our clients, our (mobile) product development, and more. We can protect consumer privacy while at the same time being able to provide our clients with the relevant information and conclusions they need. Ensuring the protection of privacy throughout the entire lifecycle of the data is of the utmost importance and BrandLoyalty is at all times careful to protect privacy as data is collected, used, and destroyed responsibly.

8. Does BrandLoyalty protect my Customer Data In case they are transferred outside the country where It is collected?

BrandLoyalty does not transfer personal data of EU consumers to receivers in third countries outside the European Union, unless it is necessary for the purpose the data is collected that the data may be transferred to another country. In that case BrandLoyalty will take the appropriate measures to ensure your data is protected within the limits set by law.

Personal data of non-EU consumers shall remain in the country where the consumers' personal data is collected, unless it is necessary for the purpose data is collected that the data may be transferred to another country. In that case BrandLoyalty will take the appropriate measures to ensure your data is protected within the limits set by law.

9. How long will BrandLoyalty keep my Customer data?

Customer data will be stored as long as necessary for the purpose for which the data is collected and processed.

To determine the data retention period of a particular category of Customer Data, BrandLoyalty uses the following criteria:

- BrandLoyalty takes maximum data retention periods, as suggested by local regulators, into account. This means that Customer Data will be stored maximum 2 years after transaction/interaction with BrandLoyalty and/or its clients, unless legal obligation applies to store longer or shorter.**
- BrandLoyalty complies with its legal requirements to record and/or store data or files for a certain minimum period, i.e. e.g. financial data 7 years for tax purposes.**

10. Which rights can I exercise with regards to my Customer data BrandLoyalty processes?

Technical data and cookies

You may regulate the collection and use of (technical) data collected via any BrandLoyalty website in your browser, by uninstalling or electing not to install an app, or via the opt-out options provided herein.

Visitors who choose to reject all cookies may have difficulty navigating the password protected areas of the Site depending on the nature of their connection (dynamic IP, proxy server, etc.).

Other data

In general, you have the right to request BrandLoyalty to have access to your data. In certain circumstances, you have a right to rectify or delete your data, to block the data processing (e.g. if the data processing is no longer necessary for BrandLoyalty's purposes), to object to the data processing (e.g. with regards to direct marketing and if you no longer wish to receive any direct marketing information from BrandLoyalty) and to invoke your right to data portability (e.g. if our data processing is based on your consent). You can invoke your rights by contacting BrandLoyalty's Data Protection Officer: DPO@brandloyalty-int.com.

If you feel we have not appropriately dealt with your complaint, you may also submit a complaint at a local data protection authority.

11. Who can I contact about my data?

If you have a question or would like to submit a complaint with regards to the collection and processing of your data by BrandLoyalty, you can contact BrandLoyalty's Data Protection Officer: DPO@brandloyalty-int.com.

Brand Loyalty International B.V.

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