

ActionSportGames A/S Privacy Statement

This privacy statement (the "Privacy Statement") describes which personal data ActionSportGames collects from you as a customer or user of our website, how we process that personal data, your rights in relation to our processing of your personal data, and the third parties with which we may share your personal data.

We believe it is important that our services are reliable and transparent. We treat your personal data with integrity and care, ensuring that we comply with applicable laws and regulations.

1. Controller

This is the Privacy Statement of ActionSportGames A/S, Company reg. no (CVR no. 27072666) ("ActionSportGames"). ActionSportGames is the controller for the processing your personal data via the relevant website and when you contact us.

This Privacy Statement also covers ActionSportGames wholly owned subsidiaries ActionSportGames USA Inc. (corporate no.: 3453303), ActionSportGames SAS (org. no.: 788861573), ActionSportGames Sweden AB (org. no.: 556574-6349) and ActionSportGames UK Ltd. (company no.: 9650027).

A reference to ActionSportGames in this Privacy Statement shall also be a reference to the other subsidiaries in the ActionSportGames Group.

2. How ActionSportGames process your personal data

This section contains information on the different purposes for which ActionSportGames processes your personal data, which personal data are being processed, what the legal basis is for ActionSportGames processing of the personal data and how long the personal data will be stored.

2.1 ActionSportGames account on our website (B2B customers)

As an ActionSportGames customer, you are granted access to your customer portal at ActionSportGames website. This account consists of your user name and pin code. Your account allows you to view information including but not limited to your contact details, account information, communications to and from ActionSportGames, orders and prices related to orders. The account is necessary for the performance of the purchase orders between you and ActionSportGames.

As a main rule, ActionSportGames retains the account data as long as you are affiliated with ActionSportGames as an ActionSportGames customer. If you terminate your customer relationship with ActionSportGames, we will delete your account within one (1) year after the relationship has ended. In accordance with statutory periods, ActionSportGames stores the data for 3 years after the customer relationship is terminated.

2.2 Sending our newsletter

If you sign up for (i.e. provide ActionSportGames with your explicit, prior consent to receive) our newsletter, we will use the e-mail address you have provided to send you the newsletter. You will then automatically be included in our newsletter database. We would like to keep you informed in this way of interesting offers relating to our products and services.

In addition to the above, ActionSportGames may also send you information, news and offers on similar products and services from ActionSportGames if you are already an ActionSportGames customer or business partner. ActionSportGames may send you such

information, news and offers without your prior consent.

Sending our newsletter is either in order to comply with your subscription, i.e. necessary to perform the agreement between you and ActionSportGames, or because it is in ActionSportGames legitimate interest to be able to inform you about our services. Unless your e-mail address has also been collected or used for any of the other, purposes specified in this Privacy Statement, we will delete your e-mail address immediately after you unsubscribe from the newsletter. If we keep your e-mail address to be used for other purposes, we will of course ensure that you no longer receive the newsletter.

You can always unsubscribe from the newsletter and indicate that you do not wish to receive any post from us. You can also object to the use of your personal data for direct marketing purposes.

2.2.1 Unsubscription

If you no longer wish to receive our newsletter or direct e-mails, you can unsubscribe via the link in the newsletter and e-mails or via the ActionSportGames website. If you also do not wish to receive any post, you can send a written request by e-mail to sales@actionsportgames.com or by regular mail to:

ActionSportGames A/S
Bjergvangen 1
DK-3060 Espergaerde
Att. Sales department

2.3 Answering your questions or complaints and service e-mails

If you have any questions about your orders, request, or other comments or complaints, please send them to us by e-mail, or contact our sales department by telephone. In that case, we will use your personal data to process your questions, to be able to contact you again, and to take any other action necessary in relation to your request. We keep a record of the times at which we have had contact with you, via which channel, the reason for the contact, and the relevant content of what has been discussed or the e-mails that have been exchanged. If you have not yet been included in our address database, with your consent, we may record your request and contact details so that we can better serve you and process any future requests more efficiently. The above-mentioned data is necessary to perform the purchase order with you or are in ActionSportGames legitimate interest to provide you with even better service. ActionSportGames retain your data for 3 years after your last visit to the ActionSportGames website.

2.4 Data collected in connection with your visit to and use of ActionSportGames website

When you visit our website, some of your data is automatically registered on our server, such as which web pages you visit, your IP address (a unique number that is automatically assigned to your computer by your internet provider when you access the internet), the name of your computer system and type of internet browser you use. We also keep track of your use of the newsletter, such as which pages you view and which parts you read. This in order to further adapt the content of the newsletter to your interests.

The information on your click and search behavior and requests enables us to create segments and classify you in one of these segments. Segments are groups of website visitors or customers on an aggregated level that have a number of common characteristics, such as age group, gender, or region. ActionSportGames uses these segments to adapt the website and, for example, to make the layout more convenient for you, change the order of search results and the design of certain pages.

We will retain important personal data in connection with the functioning of the website, such as your favorites, login status, feedback, etc., for a maximum of 3 years from the last time you visited our website or used your account. We retain data about your click and search behavior and other data recorded in connection with your visit to the website for 38 months.

See also section 4 on our use of "Cookies".

2.6 Marketing

ActionSportGames may process your personal data for marketing purposes, e.g. for sending newsletters in accordance with section 2.2 of this Privacy Statement.

ActionSportGames may combine data about your orders, your search behavior, your settings on our website and our communication with you. All this information enables ActionSportGames to conduct various forms of marketing, including via e-mail (newsletter) to make the information sent or displayed as relevant and interesting as possible for you. We measure the effectiveness of all our campaigns.

ActionSportGames may collect your prior consent to processing of your personal data for marketing purposes, e.g. in cases where ActionSportGames wishes to send you information, news and offers that are not related to your current customer or business relationship with ActionSportGames.

If ActionSportGames intends to send you news and or offers from third parties or intends to transfer your personal data to third parties, e.g. ActionSportGames business partners and/or subcontractors, for marketing purposes, ActionSportGames will obtain your prior consent hereto and inform you for what your personal data will be used. You may object to this form of disclosure at any time.

The use of your personal data in this regard is necessary for ActionSportGames in relation to its legitimate interest in informing website visitors and customers about new products and services, and to be able to attract more customers and retain customers.

ActionSportGames may use non-personal data such as demographic data to analyze and develop our marketing strategy and further improve ActionSportGames services.

2.7 Maintenance and optimization of the website

Your personal data may be used to analyze the use of and maintain our website and related technologies, to solve any malfunctions, to improve availability and to protect against fraud.

3. Social Media

You can choose to share information from our website via social media, such as Facebook, Instagram and YouTube. This means that the shared information, with your name and interests, could become visible to the visitors of your personal pages. ActionSportGames recommends that you carefully read the privacy statements of the relevant social media parties as these statements apply to the processing of your personal data by these parties.

ActionSportGames is not the controller of or responsible for the processing of information and personal data you may choose to share on other websites and social media that is not related to ActionSportGames.

4. Cookies

The personal data referred to in this Privacy Statement may be collected by the means of “cookies”. Cookies are small text files that your device or browser stores when you visit our website. ActionSportGames also uses techniques similar to cookies, such as tracking pixels, java scripts, tags and web beacons. If you revisit our website, your device or browser will be recognized. This is necessary, among other things, to remember your favorites, to store your account data so that you do not have to repeatedly enter those details, but also to be able to measure and analyze your use of our website.

We use cookies:

- for statistics, i.e.: measuring traffic on ActionSportGames, including the number of visits to actionsportgames.com, what domains visitors come from, what pages they look at on actionsportgames.com and what general geographic area the user is in.
- to enhance the functionality: improve the functionality and optimize your experience of actionsportgames.com and help you remember your username and password so you do not have to log in when you return to actionsportgames.com.

ActionSportGames may provide access for third party suppliers to inspect the contents of the cookies that are set by ActionSportGames. This information shall be used exclusively on behalf of ActionSportGames and must not be used for the third party's own purposes.

The ActionSportGames website may also contain cookies from third parties such as Google Analytics.

Data collected via Google Analytics will, as a main rule, be stored for a period of 38 months in accordance with Google Analytics' automated deletion process.

Most browsers allow you to erase cookies from your hard drive, block all cookies or receive a warning before a cookie is stored. You must be aware that in such case services and features cannot be used by you because our websites require cookies to remember the choices you make. We hope that you will allow the cookies we set as they help us improve actionsportgames.com.

By using ActionSportGames website, you provide your consent to our use of cookies as described. If you no longer wish to consent to the use of cookies, deactivate the cookies by modifying the settings in your browser (for more information, please refer to our Cookie Policy). Bear in mind that some of the website's functionalities will then no longer work properly.

You can read more about the use of cookies by ActionSportGames, including the purpose of the cookies, and the retention period, in our Cookie Policy on our website.

5. Retention period

We retain your data for as long as is necessary for the aforementioned purposes or in order to comply with statutory retention and other obligations. This Privacy Statement sets out the various retention periods applied by ActionSportGames. After the end of the retention period for a specific purpose, we will delete or anonymize your personal data regarding that purpose.

Please note that deletion of your personal data collected for a specific purpose does not necessarily mean that we have deleted all of the personal data we have collected about you. We may still have a legitimate interest in and lawful grounds for processing of part of your personal data, included, but not limited to, retention for bookkeeping requirements or similar

legal obligations. We will also continue to process your personal data if you have provided your consent to such processing.

6. Third parties

We will only share your personal data with third parties when this is necessary:

- in the context of the provision of a service by this third party that we need in order to be able to carry out your purchase order, an example of a third party processor could be shipping firms or marketing agencies.
- to settle your payment for the purchase order and other costs.
- for engaging third parties such as Google, analyzing the data about your use of the ActionSportGames website, and personalizing the website and communication (see also section 4 of this Privacy Statement on cookies),

Most of these third parties are processors and only use your personal data for the benefit of ActionSportGames. These parties are mainly established in Denmark or within the EU. A number of IT service providers are based outside the European Union or have access to personal data from outside the European Union. ActionSportGames only provides personal data to parties that guarantee they have taken the necessary measures to adequately protect the data. A processing agreement, which is entered into with processors, regulates the confidentiality and security of your personal data by these third parties, among other things. Insofar as parties from, or with access from outside the EU are involved and the country in question does not provide an adequate level of protection, the transfer of personal data by ActionSportGames is subject to the conclusion of an agreement in accordance with model clauses approved by the European Commission, or ActionSportGames must otherwise ensure that appropriate measures are adopted.

There may also be situations where ActionSportGames transfer personal data to a third party or otherwise allows a third party access to such personal data, but where the third will not be regarded as a data processor for ActionSportGames.

ActionSportGames may transfer personal data or allow access to personal data if so requested by a competent public authority, by court order or similar legal obligation. In that case, ActionSportGames is not the controller of or responsible for the public authority's processing of the personal data and ActionSportGames does not accept any liability in connection with ActionSportGames compliance with a request from a competent public authority.

7. Security

It is of great importance to ActionSportGames to keep your personal data secure. ActionSportGames has therefore adopted appropriate technical and organizational measures to protect your personal data against unauthorized or other unwanted access. ActionSportGames employees or third parties that it engages will similarly only be given access to the personal data that are necessary for the performance of their duties.

We regularly run automated security scans on our website and we protect our systems against malware, viruses, crypto ware, and hacking software.

8. Your rights with regard to your personal data (for "data subjects", i.e. customers and users)

Data subjects have certain rights according to the General Data Protection Regulation (the "GDPR").

For instance, you are entitled to view and modify, or have a third party modify, your complete data, as registered with ActionSportGames, if those data are incorrect or incomplete. You

should also modify your data, as stored in your account, if they change in the meantime. Under certain circumstances, you are also entitled to have your personal data deleted or their processing restricted by ActionSportGames, and to ask ActionSportGames to provide your personal data to either yourself or to a third party. If you wish to make changes to your personal data please contact our sales support team by e-mail or telephone. If required, ActionSportGames can send you a written copy of your data.

In short, your rights include:

- A right of access (entitled to be informed whether any personal data about the subject is being processed and if so, obtain access to the Personal Data (a copy of the personal data must be handed over)).
- A right of data portability (entitled to receive personal data about yourself, which said subject has provided to the company. This data must be provided in a structured, commonly used and machine-readable format).
- A right to rectification (entitled to obtain rectification of incorrect personal data by the data controller without undue delay).
- A right of deletion/right to be "forgotten" (with certain limitations, entitled to request erasure of personal data by us without undue delay. In that case, we are obliged to erase personal data without undue delay).
- Right to object (entitled to object to the processing of your personal data, namely if the processing of your personal data includes profiling or if the processing is based on the assessment of our interest in processing your personal data).
- Right to restriction of processing (entitled to obtain a restriction of the processing of your personal data, namely if you contest the accuracy of the personal data, or where a request to be deleted cannot be accommodated, e.g. due to ActionSportGames need to keep the personal data for the establishment, exercise or defense of legal claims).

Please note that the data subjects' rights will only be individually fulfilled by ActionSportGames in relation to the cases where ActionSportGames is considered as the data controller. In situations where ActionSportGames is regarded as the data processor, the data subjects' rights must be fulfilled by the data controller.

9. Contacting ActionSportGames

In order to exercise your rights with regard to your personal data, please contact ActionSportGames by e-mail sales@actionsportgames.com.

Please note that in order to make sure that we do not send your personal data to any unauthorized persons or entities, you may be asked to confirm your identity by e.g. providing a copy of your passport, by validation via NemID or similar secure confirmation method.

You can also contact us without obligation for other questions about our use of your personal data, this Privacy Statement, or other matters relating to our services or this website. Your question or comment will be dealt with expertly, confidentially, and as quickly as possible.

If you have any complaints about how ActionSportGames deals with your personal data, you can also always contact the Danish Data Protection Agency.

The contact information for the Danish Data Protection Agency is:

Datatilsynet

Borgergade 28, 5
DK-1300 Copenhagen K
T: (0045) 3319 3200

F: (0045) 3319 3218
E-mail: dt@datatilsynet.dk

ActionSportGames may update this Privacy Statement from time to time. The latest version of the Privacy Statement will always be available at ActionSportGames website.

Espergaerde, 23 May 2018