

## **Privacy policy WakaWaka B.V.**

### **1. Introduction**

1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.

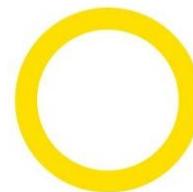
### **2. In General**

2.1 WakaWaka B.V. ("<http://waka-waka.com/>") owns and operate this Website.

### **3. Collecting personal information**

3.1 We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
- (b) information that you provide to us when registering with our website (including your email address);
- (c) information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship



status, interests and hobbies, educational details and employment details)

(d) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);

(e) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use;

(f) information relating to any purchases you make of our goods or any other transactions that you enter into through our website (including your name, address, telephone number, email address and card details;

(g) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);

(h) information contained in or relating to any communications that you send to us or send through our website (including [the communication content and meta data associated with the communication]); and

(i) any other personal information that you choose to send to us.

3.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## **4. Using your personal information**

4.1 Personal information submitted to us through our website will be used for the



purposes specified in this policy or on the relevant pages of the website.

4.2 We may use your personal information to:

- (a) administer our website and business;
- (b) personalise our website for you;
- (c) enable your use of the services available on our website;
- (d) send you goods purchased through our website;
- (e) supply to you services purchased through our website;
- (f) send statements, invoices and payment reminders to you, and collect payments from you;
- (g) send you non-marketing commercial communications;
- (h) send you email notifications that you have specifically requested;
- (i) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
- (j) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
- (k) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- (l) deal with enquiries and complaints made by or about you relating to our website;
- (m) keep our website secure and prevent fraud; and
- (n) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service);



4.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the licence you grant to us.

4.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.

4.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

4.6 All our website financial transactions are handled through our payment services provider Docdata. You can review the provider's privacy policy at <http://www.docdatapayments.com/en/products-and-services/privacy-policy>. We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

## **5. Disclosing personal information**

5.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

5.2 We may disclose your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

5.3 We may disclose your personal information:



- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

5.4 Except as provided in this policy, we will not provide your personal information to third parties.

## **6. International data transfers**

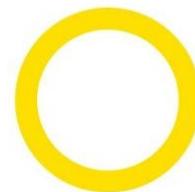
6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.

6.2 Information that we collect may be transferred to the following countries which

do not have data protection laws equivalent to those in force in the European Economic Area: the United States of America, Russia, Japan, China and India.

6.3 Personal information that you publish on our website or submit for publication on

our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.



6.4 You expressly agree to the transfers of personal information described in this Section 6.

## **7. Retaining personal information**

7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

7.4 Notwithstanding the other provisions of this Section 7, we will retain documents

(including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **8. Security of your personal information**

8.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.



8.2 We will store all the personal information you provide on our secure (password-and firewall-protected) servers.

8.3 All electronic financial transactions entered into through our website will be protected by encryption technology.

8.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

8.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## **9. Amendments**

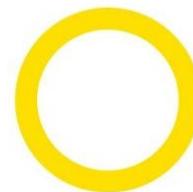
9.1 We may update this policy from time to time by publishing a new version on our website.

9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

9.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **10. Your rights**

10.1 You may instruct us to provide you with any personal information we hold



about

you; provision of such information will be subject to:

(a) the payment of a fee (currently fixed at GBP 10); and

(b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

10.2 We may withhold personal information that you request to the extent permitted

by law.

10.3 You may instruct us at any time not to process your personal information for marketing purposes.

10.4 In practice, you will usually either expressly agree in advance to our use of your

personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **11. Third party websites**

11.1 Our website includes hyperlinks to, and details of, third party websites.

11.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.



## **12. Updating information**

12.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **13. Cookies**

13.1 Our website uses cookies.

13.2 A cookie is a file containing an identifier (a string of letters and numbers) that is

sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

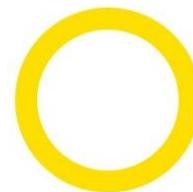
13.3 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

13.4 Cookies do not typically contain any information that personally identifies a user,

but personal information that we store about you may be linked to the information stored in and obtained from cookies.

13.5 We use both session and persistent cookies on our website.

13.7 Most browsers allow you to refuse to accept cookies; for example:



(a) in Internet Explorer (version 10) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";

(b) in Firefox (version 24) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and

(c) in Chrome (version 29), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

13.8 Blocking all cookies will have a negative impact upon the usability of many websites.

13.9 If you block cookies, you will not be able to use all the features on our website.

13.10 You can delete cookies already stored on your computer; for example:

(a) in Internet Explorer (version 10), you must manually delete cookie files (you can find instructions for doing so at

<http://support.microsoft.com/kb/278835>);

(b) in Firefox (version 24), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history", clicking "Show Cookies", and then clicking "Remove All Cookies"; and

(c) in Chrome (version 29), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Delete cookies and other site and plug-in data" before clicking "Clear browsing data".

13.11 Deleting cookies will have a negative impact on the usability of many websites.

13.12 Other important cookie information



## WakaWaka's Cookie policy

### What are cookies?

A cookie is a small text file that is stored on the internet in the browser of your computer, tablet or smartphone.

According to the regulation we may save cookies directly on your device if they are strictly for the use of the site (for example to remember what you put in your basket before you check-out). For all other types of cookies we need your consent.

This website uses different types of cookies. Some cookies are placed by third-party services in order to monitor your behaviour for after website visit personalised content advertisement.

In order to be transparent in our way of working we want to inform you on how we use cookies and your information.

### Necessary cookies

These help make a website more user-friendly for basic functions as page navigation and access to secured parts of the website. Without these cookies, the website can not work according properly. For instance; when you add an item to your basket before checking out. It is because of a necessary cookie that it can be saved.

Other cookie example in this category:

COOKIE NAME: csrftoken nl.waka-waka.com

EXPIRY: 1 year

Cookie purpose description: Helps prevent Cross-Site Request Forgery (CSRF) attacks.



## Marketing & Statistical cookies

### \*Statistical cookies

These help website owners understand how a website is used by gathering anonymous data and reporting it.

### \*Marketing cookies

There are different types of marketing cookies which come from 3rd party suppliers. Their goal is to display advertisements that are relevant to the individual user after they exit the website.

In order to optimize the user experience, show only relevant content to our visitors we use the following third party suppliers by gathering cookie information:

### Google Analytics - Statistical cookies and remarketing information

WakaWaka B.V. uses Google Analytics to monitor and report on behavioural information related to the websites. WakaWaka BV. has taken the necessary steps to anonymize this information and not share the information with any other party or benchmark analysis. WakaWaka B.V. does share information with Google Adwords in order to show relevant advertisements (remarketing) to visitors after they have left the website.

Steps WakaWaka has taken to follow a friendly privacy approach with Google Analytics:

The Data Processing Amendment for this account was accepted on 8 May 2018.

Data is collected through an anonymous IP approach

We do not share any data for benchmarking and research purposes

We inform our visitors on the fact that we use Google Analytics and the way in which in their data is collected.



The data retention period is set to 26 months after which the all data will be deleted.

Do you want to opt-out of Google Analytics completely? We recommend using a browser add-on (for instance: Google Analytics Opt-out Browser Add-on) to do so independently. You can opt out of using Cookies by Google by visiting the Google opt-out page for ads at [policies.google.com/technologies/ads](https://policies.google.com/technologies/ads).

For more information about the data that Google collects and how it is processed, see the privacy policy of Google here [policies.google.com/privacy?hl=en](https://policies.google.com/privacy?hl=en).

#### Hotjar - website behaviour insights

Hotjar is a software we use to help us improve the user experience on our website ([www.hotjar.com](http://www.hotjar.com)). Hotjar helps us to know how users use the website (mouse movements, clicks, scrolling, etc.). For this purpose, Hotjar uses analytical cookies to collect non-personally identifiable information, including standard internet log information and details of the behavioral patterns of visitors to our website. By using our website, you acknowledge and accept our privacy practices and those of Hotjar. Please refer to Hotjar's privacy policy ([www.hotjar.com/legal/policies/privacy](http://www.hotjar.com/legal/policies/privacy)) for more information about Hotjar collection and how this is being processed.

#### Retargeting/remarketing through Facebook & Google Adwords

The use of cookies for remarketing allows us to display advertisements after your visit to WakaWaka websites and to collect information about your browsing habits. In this way we can make advertisements more relevant and personal to you and your interests.

#### Facebook.

These cookies are set by Facebook and we use a pixel in the code to allow



Facebook to gather data. Facebook uses cookies to collect data about the interests of its users and after you have visited our website it can cross-match that information on the base of your profile. Facebook uses this data to deliver targeted advertising.

Google Adwords.

These cookies are set by Google. With these cookies, Google can profile the interests of visitors and ensure that relevant ads reach you on third-party websites or through searches. These cookies can also be used to retarget you on other websites or on Google Search through profiling.

What can I do to change my Cookie settings?

Most browsers and devices allow you to remove tracking technologies and / or block new tracking technologies.

AdChoices: is an initiative that encourages online advertising platforms to include an advertising option icon in all ads or web pages where data is collected and used for behavioral advertising. Find more information here: [youradchoices.com/control](http://youradchoices.com/control).

Hotjar: You can choose at any time that Hotjar ceases to collect your information: [www.hotjar.com/legal/compliance/opt-out](http://www.hotjar.com/legal/compliance/opt-out).

Google Analytics: If you prefer not to share data with Google Analytics, you can install the Google Analytics opt-out browser add-on by following the instructions here: [tools.google.com/dlpage/gaoptout?hl=NL](https://tools.google.com/dlpage/gaoptout?hl=NL). You can opt out of using Cookies by Google by visiting the Google opt-out page for ads at [policies.google.com/technologies/ads](https://policies.google.com/technologies/ads).



Facebook Ads: You can control how Facebook uses data to display ads by disabling ads that may be based on interests and / or your relationship with specific advertisers in your preferred ad settings. For more information, go to the different Facebook pages where you can learn more about ads and cookies on Facebook and to update your settings:

[nl-nl.facebook.com/policies/cookies/](https://nl-nl.facebook.com/policies/cookies/)

[nl-nl.facebook.com/about/ads](https://nl-nl.facebook.com/about/ads)

[nl-nl.facebook.com/ads/preferences/edit/](https://nl-nl.facebook.com/ads/preferences/edit/)

## **14. Our details**

14.1 This website is owned and operated by WakaWaka B.V.

14.2 We are registered in the Netherlands under registration number 53526171 in Amsterdam and our registered office is at Wilhelminastraat 18, 2011 VM Haarlem, The Netherlands

14.3 Our principal place of business is at Wilhelminastraat 18, 2011 VM Haarlem, The Netherlands.

14.4 You can contact us by writing to the business address given above, by using our website contact form, by email to [info@waka-waka.com](mailto:info@waka-waka.com).