

Privacy Policy

POS MEDIA PRIVACY PRINCIPLES

POS Media takes privacy seriously. The following five principles underpin our approach to respecting your privacy:

1. We value the trust that you place in us by giving us your personal information. We will always use your personal information in a way that is fair and worthy of that trust.
2. You are entitled to clear information about how we use your personal information. We shall always be transparent with you about what information we collect, what we do with it, with whom we share it and whom you should contact if you have any concerns.
3. If you have any concerns about how we use your personal information, we will work with you to promptly resolve those concerns.
4. We will take all reasonable steps to protect your information from misuse and keep it secure.
5. We will comply with all applicable data protection laws and regulations and we will co-operate with data protection authorities. In the absence of data protection legislation, we will act in accordance with generally accepted principles governing data protection.

POS MEDIA PRIVACY POLICY

Last Updated: December 2017

POS Media is committed to protecting your privacy and ensuring that your personal information is protected. This Privacy Policy explains the types of personal information we collect and how we use, disclose and protect that information.

What does this Privacy Policy apply to?

This Privacy Policy applies to personal information collected by the POS Media Group of companies in connection with the services they offer. Find out more about the POS Media Group at <http://pos-media.eu>. This includes information collected offline through our Careline and consumer call centres, direct marketing campaigns, sweepstakes and competitions, and online through our websites, branded pages on third party platforms and applications accessed or used through such websites or third party platforms which are operated by or on behalf of the POS Media Group ("**POS Media Sites**"). This Privacy Policy is hereby incorporated into and forms part of the terms and conditions of use of the applicable POS Media Site. For information about the POS Media Group company responsible for protecting your personal information, see [Your privacy rights and who to contact](#) below.

This Privacy Policy does not apply to the information practices of:

- third party companies (including, without limitation, their websites, platforms and/or applications) which we do not own or control; or
- individuals that POS Media does not manage or employ.

These Third Party Sites may have their own privacy policies and terms and conditions. We encourage you to read them before using those Third Party Sites.

Your consent

POS Media will not collect, use or disclose your personal information without your consent. In most cases, we will ask for your consent explicitly but, in some cases, we may infer consent from your actions and behaviour.

By using a POS Media Site, you are consenting to the relevant POS Media Group company collecting, using and disclosing your personal information in accordance with this Privacy Policy.

We may ask you to provide additional consent if we need to use your personal information for purposes not covered by this Privacy Policy. You are not obliged to provide such consent but if you decide not to then your participation in certain activities may be restricted. If you provide additional consent, the terms of that consent shall prevail in the event of any conflict with the terms of this Privacy Policy.

If you do not agree to the collection, use and disclosure of your personal information in this way, please do not use the POS Media Sites or otherwise provide POS Media with personal information.

What information do we collect?

In this Privacy Policy, your "personal information" means information or pieces of information that could allow you to be identified. This typically includes information such as your name, address, screen name, profile picture, email address, and telephone number, but can also include other information such as IP address, shopping habits, preferences and information about your lifestyle or preferences such as your hobbies and interests. We may collect personal information about you from different sources, including:

- Information you give us directly

- ● name
- ● address
- ● email address
- ● user name
- ● telephone number
- ● age
- ● date of birth
- ● gender
- ● user-generated content, posts and other content you submit to POS Media Sites
- ● any other personal information you voluntarily provide to us

- Information we collect automatically when you use the POS Media Sites

- ● information about the type of browser you use
- ● details of the web pages you have viewed
- ● your IP address
- ● the hyperlinks you have clicked
- ● your user name, profile picture, gender, networks and any other information you choose to share when using Third Party Sites (such as when you use the "Like" functionality on Facebook or the +1 functionality on Google+)
- ● the websites you visited before arriving at a POS Media Site

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- Information we collect from other sources

- ● name
- ● street address
- ● age
- ● your shopping habits
- ● preferences and information about your lifestyle such as your hobbies and interests
- ● publicly available information such as user-generated content, blogs and postings, as permitted by law

How do we use your personal information?

We may use your personal information:

- ● to improve our products and your experience on the POS Media Sites.
- ● evaluate the use of the POS Media Sites, products and services
- ● analyse the effectiveness of our advertisements, competitions and promotions
- ● personalise your website experience, as well as to evaluate (anonymously and in the aggregate) statistics on website activity, such as what time you visited it, whether you've visited it before and what site referred you to it

- • make the POS Media Sites easier to use and to better tailor the POS Media Sites and our products to your interests and needs
 - • help speed up your future activities and experience on the POS Media Sites. For example, a site can recognise that you have provided your personal information and will not request the same information a second time
 - • collect information about the device you are using to view the POS Media Site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your personal information so as to ensure that the POS Media Sites present the best web experience for you
- • to contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
 - • suggest products or services (including those of relevant third parties) which we think may be of interest to you
 - • offer you the opportunity to take part in competitions or promotions
 - You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the information and means necessary to opt out.
- • to provide you with products or services that you request from us.
 - • for the purposes of competitions or promotions that you have entered
 - • to send you information, products or samples that you have requested
 - • to respond to your queries or comments
- Where we collect personal information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect information from accidental or malicious destruction, when we delete information from our services we may not immediately delete residual copies from our servers or remove information from our backup systems.

Who do we share your personal information with?

As a general rule, we do not share your personal information with anyone outside of the POS Media Group. However, we may share your personal information with trusted third parties.

- our advertising, marketing and promotional agencies to help us deliver and analyse the effectiveness of our advertising campaigns and promotions
- third parties required to deliver a product or service to you, such as a delivery or postal service delivering a product that you have ordered
- law enforcement or government authorities where they have followed due legal process to request us to disclose the information
- third parties who wish to send you information about their products and services, but only if you have given us consent to do so
- third party providers of services, such as data processing, to POS Media
- web analytics tool providers, such as Google or Unica

We may also share your personal information with companies, organisations or individuals outside of the POS Media Group if we believe that disclosure of the information is necessary for legal reasons.

- enforce applicable terms of use of POS Media Sites
- conduct investigations into possible breaches of applicable laws
- detect, prevent and protect against fraud and any technical or security vulnerabilities
- comply with applicable laws and regulations, co-operate in any legal investigation and meet enforceable governmental requests

If we do share your personal information with a third party, we shall use our best efforts to ensure that they keep your information secure, take all reasonable steps to protect it from misuse and only use it in a manner consistent with this Privacy Policy and applicable data protection laws and regulations.

POS Media does not sell personal information, except to an entity to which we divest all or a portion of our business (for example, in connection with our sale of a brand), or otherwise in connection with a merger, consolidation, change in control, reorganization or liquidation of all or a portion of our business.

Transferring your personal information

We may transfer your personal information to servers located outside the country in which you live or to affiliates or other trusted third parties based in other countries so that they may process personal information on our behalf. By using a POS Media Site or otherwise providing POS Media with personal information, you agree to us doing so in accordance with the terms of this Privacy Policy and applicable data protection laws and regulations.

You should be aware that many countries do not afford the same legal protection to personal information as you might enjoy in your country of origin. While your personal information is in another country, it may be accessed by the courts, law enforcement and national security authorities in that country in accordance with its laws. Subject to such lawful access requests, we promise that anyone processing your personal information outside your country of origin is required to implement measures to protect it and is only entitled to process it in accordance with POS Media's instructions.

Safeguarding your personal information

We take all reasonable precautions to keep your personal information secure and require any third parties that handle or process your personal information for us to do the same. Access to your personal information is restricted to prevent unauthorised access, modification or misuse and is only permitted among our employees and agents on a need-to-know basis.

Your privacy rights and who to contact

If you have any questions, comments or concerns about how we handle your personal information, then you may contact us by clicking the **Contacts** link on the POS Media Site that directed you to this Privacy Policy. Alternatively, please go to www.pos-media.eu, select the appropriate country and click on the **Contacts** link. Your request will be directed to the appropriate POS Media group company.

You have the right to tell us if you:

- don't want to be contacted in the future by us
- would like a copy of the personal information which we hold about you
- would like us to correct, update or delete your personal information in our records
- wish to report any misuse of your personal information

To assist us in dealing with your request, please provide your full name and details.

Changes to our Privacy Policy

We may change this Privacy Policy from time to time by posting the updated version of the Privacy Policy on the POS Media Sites. We will give you reasonable notice of any material change. We encourage you to visit frequently to stay informed about how we use your personal information.

Other POS Media privacy policies

In addition to this Privacy Policy, there may be specific campaigns or promotions which will be governed by additional privacy terms or policies. We encourage you to read these additional terms or policies before participating in any such campaigns or promotions as you will be required to comply with them if you participate. Any additional privacy terms or policies will be made prominently available to you.