

SneakGeek Privacy Policy - Your Privacy Rights

PRIVACY AND COOKIES POLICY

This is the Privacy and Cookies Policy for the website hosted at www.sneakgeek.app ("we", "us" and "our site") and the SneakGeek app "our App" (together, the "Platforms"). The Platforms are operated by or on behalf of SNEAK GEEK CO.,LTD. We are committed to protecting and respecting your privacy.

This policy (together with our Terms and Conditions and any other documents referred to in it) sets out:

- Information we collect about you
- Cookies and other technologies
- How we use your information
- Our promotional updates and communications
- Who we give your information to
- Where we store your information
- Payment processing
- How we protect your information
- How long we keep your information
- Your rights
- Changes to this policy
- Contact us

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

Any terms we use in this policy without defining them have the definitions given to them in the Terms of Use. This policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules, or regulations. This policy does not cover the practices of companies we don't own or control or people we don't manage.

By using the Platforms you acknowledge you have read and understood this Privacy Policy.

The data controller is: SNEAK GEEK CO.,LTD, 8 Tran Kim Xuyen, Cau Giay, Ha Noi, Viet Nam.

Information we collect about you

We will collect and process the following Personal Data from you:

- **Information you give us**

This is information about you that you give us directly when you interact with us.

This is information about you that you give us by filling in forms on our Platforms or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our Platforms, subscribe to our service, search for a product, place an order on the Platforms, on or via our Platforms, enter a competition, promotion or survey, submit a query, and when you report a problem with our Platforms.

The information you give us may include your name, postal and billing address, e-mail address, phone number and financial information, login and password details. If you provide us payment details or make a purchase through our Platforms, we will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their privacy policy(ies). Please see the Payment processing section below for more information.

- **Information we collect about you from your use of our Platforms:** We will automatically collect information from you each time you visit our Platform. This includes:
 - Technical information
 - Information about your visit

Technical information may include the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Information about your visit may include the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number or social media handle used to connect with our customer service team.

- **Personal Data of Children:** As noted in the Terms and Conditions, we do not knowingly collect or solicit Personal Data from children under 16; if you are a child under 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16, we will delete that information as quickly as possible. If you believe that a child under 16 may have provided us Personal Data, please contact us at support@sneakgeek.com.

Cookies and other technologies

Our Platforms use cookies to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies and similar technologies enable you to be remembered when using that computer or device to interact with websites and online services and can be used to manage a range of features and content as well as storing searches and presenting personalized content.

Our Platforms use cookies and similar technologies to distinguish you from other users of our Platforms. This helps us to provide you with a good experience when you browse our Platform and also allows us to improve our Platforms.

Most web browsers automatically accept cookies and similar technologies, but if you prefer, you can change your browser to prevent that and your help screen will tell you how to do this. We also give you information about **Disabling cookies**. However, you may not be able to take full advantage of our website if you do so.

A number of cookies and similar technologies we use last only for the duration of your web or app session and expire when you close your browser or exit the App. Others are used to remember you when you return to the Platforms and will last for longer.

We use these cookies and other technologies on the basis that they are necessary for the performance of a contract with you, with your consent for non-essential cookies or where the cookie is strictly necessary/essential, because using them is in our legitimate interests (where we have considered that these are not overridden by your rights).

We use the following types of cookies:

- **Strictly necessary** cookies. These are cookies that are required for the operation of our website and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. These are necessary for our legitimate interests of enabling you to use our website. All other cookies will only be used if you have given your consent.
- **Analytical/performance** cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality** cookies. These are used to recognize you when you return to our website. This enables us, subject to your choices and preferences, to personalize our content, and remember your preferences (for example, your choice of language or region).
- **Targeting** cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information with your consent subject to your choices and preferences to make our Platforms and the advertising displayed on it more relevant to your interests (as further set forth below). **We may also share this information with third parties for this purpose.**

We may also work with advertising networks that gather information about the content on our Platforms you visit and on information on other websites and services you visit. This may result in you seeing advertisements through our Platforms or our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off see below or visit <http://www.youronlinechoices.co.uk>.

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors ("Interest-Based Ads"). Information for Internet-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users' activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a "web beacon") from an ad network to you through the Services. Web

beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

- **Disabling cookies**

The effect of disabling cookies depends on which cookies you disable but, in general, the website may not operate properly if all cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our Platforms. If you disable all cookies, you will be unable to complete a purchase on our Platforms. Please note that because of our use of cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

If you want to disable cookies on our site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

For Microsoft Internet Explorer:

1. Choose the menu “tools” then “Internet Options”
2. Click on the “privacy” tab
3. Select the setting the appropriate setting

For Google Chrome:

1. Choose Settings then Advanced
2. Under "Privacy and security," click “Content settings”.
3. Click “Cookies”

For Safari:

1. Choose Preferences then Privacy
2. Click on “Remove all Website Data”

For Mozilla Firefox:

1. Choose the menu “tools” then “Options”
2. Click on the icon “privacy”
3. Find the menu “cookie” and select the relevant options

For Opera 6.0 and further:

1. Choose the menu Files then “Preferences”
2. Privacy

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site.

Except for essential cookies, all cookies used on our site will expire after thirteen (13) months.

How we use your information

You can see a full list of the types of data we process, the purpose for which we process it and the lawful basis on which it is processed below, under the heading 'Purpose and lawful basis for processing of Personal Data.'

We use information held about you in the following ways:

- **Information you give to us:**

We will use this information to:

- Take steps in order to enter into any contract or carry out our obligations arising from any contract entered into between you and us including:
 - administering your account with us;
 - notifying you about changes to our service.
- Provide you with information about our goods we feel may interest you, if you have given your consent to receiving marketing material from us at the point we collected your information, where that consent is required by law or, if it is not required by law, then in our legitimate interests provided these interests do not override your right to object to such communications. See 'Our promotional updates and communications'.
- Ensure in our legitimate interests that:
 - content from our Platforms is presented in the most effective manner for you and for your computer.
 - we provide you with the information, products and services that you request from us.

- **Information we collect about you from your use of our Platforms**

We will use this information in our legitimate interests, where we have considered these are not overridden by your rights:

- To administer our Platforms and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To keep our Platforms safe and secure.
- For measuring or understanding the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To improve our Platforms to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service, when you choose to do so.

In some cases, provision of your information may be necessary to provide you with our Services. In these cases, if you fail to provide certain information when requested, we may not be able to give you access to our Services. In other cases, for example when we request your information so that we can send you marketing and promotional communications, if you do not provide the information we will not send you the marketing and promotional communications. We will specify the consequences of refusal to provide personal information at the time of the collection.

Our promotional updates and communications

Where permitted by law in our legitimate interest or with your prior consent, we will use your personal information for marketing analysis and to provide you with promotional update communications by email about our products.

You can object to further marketing at any time by checking and updating your contact details within your account, or selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you.

Who we give your information to

We may give your information to:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of Personal Data in order to provide Services to you under this policy, where necessary for our legitimate interests, if we have considered these are not overridden by your rights. If any of these parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent.
- Selected third parties. Our selected third parties may include:
 - Analytics and search engine providers that assist us in the improvement and optimization of our site and subject to your consent and the cookie section of this policy (this will not identify you as an individual).
 - Where necessary for a contract, business partners who jointly with us provide Services to you and with whom we have entered into agreements in relation to the processing of your Personal Data (as detailed under the business partners' privacy policy).
 - Payment processing providers who provide secure payment processing services. Note your payment card details are not shared with us by the provider.
 - Other parties at your direction.
 - Other users (where you post information publicly or as otherwise necessary to effect a transaction initiated or authorized by you through the Services).
 - Social media services (if you intentionally interact with them through your use of the Services).
 - Third-party business partners who you access through the Services.
 - Other parties authorized by you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets subject to the terms of this privacy policy.
- If SNEAK GEEK CO.,LTD or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, regulation, process or governmental request, or in order to enforce or apply our terms of supply terms and other agreements with you; or to protect the rights, property, or safety of SNEAK GEEK CO.,LTD, our customers, or others. This includes exchanging information with other companies and organizations, including law enforcement agencies, for the purposes of fraud protection and credit risk reduction and to prevent cyber or other suspected or alleged crime.
- Auditing related to a current interaction and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.

- Short-term, transient use of Personal Data that is not used by another party to build a consumer profile or otherwise alter your consumer experience outside the current interaction.
- Performing services on our behalf, including [maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that we own, manufacture, control or was manufactured for us.

Payment processing

Payments made on the Platforms are made through our payment gateway provider, ONEPAY JSC. You will be providing credit or debit card information directly to ONEPAY JSC. which operates a secure server to process payment details, encrypting your credit/debit card information and authorizing payment. Information which you supply to ONEPAY JSC. is not within our control and is subject to ONEPAY JSC 's own privacy policy and terms and conditions.

How we protect your information

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using TLS 1.3 (a strong protocol), X25519 (a strong key exchange), and AES 128 GCM (a strong cipher). Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Platforms, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our Platforms; any transmission is at your own risk. Once we have received your information, we will implement appropriate technical and organizational measures to protect your information from unauthorized access, loss, destruction or alteration.

Our site may, from time to time, contain links to external sites. We are not responsible for the privacy policies or the content of such sites.

How long we keep your information

We retain Personal Data for as long as you have an account with us in order to meet our contractual obligations to you and, where permitted by law, for six years after that to identify any issues and resolve any legal proceedings. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our Services. You cannot be identified from aggregate information retained or used for these purposes. Local jurisdiction legal retention obligations remain unaffected. If you would like to know more about these, please contact us at support@sneakgeek.com

Your rights

- You have the right under certain circumstances:
 - to be provided with a copy of your Personal Data held by us;
 - to request the rectification or erasure of your Personal Data held by us;
 - to request that we restrict the processing of your Personal Data (while we verify or investigate your concerns with this information, for example);
 - **to object to the further processing of your Personal Data, including the right to object to marketing communications, if applicable** (as mentioned in 'Our promotional updates and communications' section);
 - to request that your Personal Data be provided to you in a structured, commonly used and machine-readable format to transmit them to a third party;
 - to provide instructions about your data after death.
- Your right to withdraw consent:
- Where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time by contacting us support@sneakgeek.com . You can also change your marketing preferences at any time as described in 'Our promotional updates and communications' section. In such case, you have the right to object to the processing of the data for direct marketing purposes through automated means and non-automated means. If you object to the processing of the data for marketing purposes, this will also apply to any processing of your personal information for profiling purposes to the extent that it is related to such marketing purposes. You can also object to the data processing for profiling purposes only.

You can also exercise the rights listed above at any time by contacting us at support@sneakgeek.com

Changes to this policy

Any changes we make to our privacy policy in future will be posted on this page and, in relation to substantive changes, will be notified to you by e-mail. This policy was last updated on February 10, 2020.

Contact Us

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to support@sneakgeek.com

SNEAK GEEK CO.,LTD

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