

# **Privacy Statement Royal Dutch Gazelle**

# Applicability

This Privacy Statement of ROYAL DUTCH GAZELLE ("GAZELLE") applies to the collection, use and other forms of processing of personal data by GAZELLE in connection with our service, brand products of GAZELLE and this website or app. Through using this website or app you recognise and agree to the conditions of this Privacy Statement.

# Who is responsible for the processing of your personal data?

GAZELLE (Wilhelminaweg 8, 6951 BP, Dieren, The Netherlands) is the legal entity responsible for all the collection and processing of your personal data in connection with the brand products, services and websites of GAZELLE.

GAZELLE is part of Pon Holdings B.V. and its affiliated subsidiaries ("Pon"). GAZELLE and Pon are committed to respecting and protecting your privacy and the security of the personal data that you share with us.

#### Why do we collect your personal data?

If you decide to register your personal data with us, contact us or visit our websites, we collect a few of your personal details. We can use this personal data for the following purposes:

- 1. communicating with you in a personal manner or informing you about brand products and/or services of GAZELLE.
- 2. providing customer service, including service regarding the purchasing of services and/or products, meeting guarantee obligations and product recalls for our own service provision and that of affiliated companies, and handling complaints and requests for information;
- 3. processing your purchase of brand products of GAZELLE including financial and logistical handling;
- 4. processing your account with GAZELLE;
- 5. processing your participation in competitions, promotions, surveys or websites functions;
- 6. carrying out market research and improving our business operations, services and GAZELLE brand products;



- 7. carrying out statistical analyses and describing them out in reports;
- 8. providing services on the Internet;
- 9. communicating with participants and providing a loyalty programme;
- 10. providing app functionalities, including sending relevant commercial messages;
- 11. communicating future promotional and marketing information, including for direct marketing and retargeting purposes;
- 12. meeting our legal responsibilities, settling disputes and enforcing our contracts;
- 13. if otherwise indicated on or around the time the personal data is collected.
- 14. in order to, if applicable and with your permission, provide the recovery partner of the insurer with location and technical details of the vehicle for recovery purposes (see also Article 7 of the Privacy Statement) [principle: 1];

#### What personal data do we collect?

The precise data that we collect depends on what you use and how you use it. In general, we collect and use three categories of data:

| Data that                | This is the data that you optor yourself when you visit our websites or use our  |
|--------------------------|--|
| Data that<br>you provide | This is the data that you enter yourself when you visit our websites or use our products or services. This data includes your name, address, gender, email address, telephone number, age, date of birth, GAZELLE products that you have bought, the account name and password that you create, bank details for paying for GAZELLE products, etc. |
|                          |  |





| Data<br>collected via<br>sensors | Many products are fitted with one or more sensors or use the sensors of the devices on which the products are fitted. Examples of sensors are GPS receivers, WiFi or Bluetooth receivers, a camera and touchscreens.   |
|----------------------------------|--|
|                                  | In accordance with the purposes, the data about you collected via the sensors and the devices is sent to GAZELLE and other external parties that need the data in order to provide GAZELLE with the agreed services.   |
|                                  |  |
| Metadata                         | This is data that is collected or automatically generated whilst the website,<br>products or services of GAZELLE are being used. Metadata is often collected<br>or generated when you use a computer device or when you send data via a<br>computer network, such as the Internet. This data includes information that<br>you use in the user interface and during other device activities, as well as IP<br>addresses, unique device IDs, MAC addresses of WiFi and Bluetooth<br>devices, cookies and details of computer activities. |

# Why do we collect your personal data?

Below we indicate for each method of collection the category of personal data that we collect and the purpose for which we do so:



| Collection method                       | Categories of personal data that is collected | Purpose of using personal data   |
|---|---|--|
| Newsletter subscription                 | - The data that you provide                   | The above described<br>purposes: 1, 2, 6, 7, 8,<br>11, 12 and 13       |
| Contact form of our<br>customer service | - The data that you provide                   | The above described<br>purposes: 1, 2, 6, 7, 8,<br>11, 12 and 13       |
| Creating a GAZELLE<br>account           | - The data that you provide                   | The above described<br>purposes: 1, 2, 4, 6, 7,<br>8, 9, 11, 12 and 13 |



|  | / |
|--|---|
|  |   |
|  |   |

| - Data that you provide      | The above described purposes:  |
|------------------------------|--|
| - Data collected via sensors | 1, 2, 3, 4, 7, 8, 9, 10,<br>11, 12, 13, 14                             |
| - Metadata                   |  |
|                              |  |
| - The data that you provide  | The above described<br>purposes: 1, 2, 3, 6, 7,<br>8, 9, 11, 12 and 13 |
|                              |  |
| - The data that you provide  | The above described<br>purposes: 1, 2, 3, 6, 7,<br>8, 9, 11, 12 and 13 |
|                              |  |
|                              | - Data collected via sensors - Metadata - The data that you provide    |



| Participating in a<br>promotion, event,<br>competition or online<br>forum | - The data that you provide   | The above described<br>purposes: 1, 5, 6, 7, 8,<br>11, 12 and 13 |
|---|---|--|
| Visiting our websites<br>(cookies)  | - Metadata.<br>NB: see the GAZELLE cookie policy for further details  | The above described<br>purposes: 6, 7, 8, 11,<br>12 and 13       |
| Logging in via social<br>media to our websites                            | - The data that you provide<br>NB: at no time do we gain access to<br>your account; we only see your account<br>name and the messages that you place. | The above described<br>purposes: 1, 6, 7, 8,<br>11, 12 and 13    |

If you choose to register your personal data in one of the above ways and explicitly give your permission or visit our websites and accept the cookies, you authorise GAZELLE and its suppliers to collect, store, use or publish your personal data for legal purposes or process the data in accordance with the above purposes.

If you have given your permission for your personal data to be processed, you have the right to revoke this at any time.



#### How do we share or transfer your personal data?

You should be aware that GAZELLE is part of a business group within Pon, and that departments (such as marketing and IT) may form part of Pon's worldwide businesses. As a result of this, your personal data may be shared worldwide with and/or transferred to other business group companies or other Pon business units.

GAZELLE can also share your personal data with external parties in order to carry out activities on behalf of GAZELLE. GAZELLE requires that these external parties process and protect your personal data with care. Other than in the ways described in this Privacy Statement, GAZELLE will not sell, rent, lease or offer your personal data to external parties so that they can use them for their own purposes.

GAZELLE or Pon can sell (part of) a business to another company. If such a company is related to GAZELLE, such a transfer of property may include the transfer of your personal data to the new owner.

We will only publish your personal data if this is permitted or authorised by law, necessary for preventing or combating fraud, necessary for settling disputes or necessary for any other legitimate needs that under the circumstances outweigh your privacy interests, such as the safety of our company and personal.

#### How do we protect your personal data?

GAZELLE will take appropriate technical and organisational measures to protect your personal data against loss or illegal processing. This may involve the use of secured registration forms, encoding of data and access restrictions to your personal data.

Certain countries do not have an adequate protection level for personal data. You can, however, trust GAZELLE to take appropriate security measures regarding the confidentiality and access to your personal data.

#### How long do we keep your personal data?

After you have used the opt-out option or have deleted your account, your personal data will be deleted within a reasonable period of time. For this we have a retention period policy and store only the personal data that is necessary for complying with legal requirements, settling disputes and enforcing our contracts.

#### **Only relevant for Gazelle Connect:**



If your electric Connect bike has been stolen, it is possible in the app to register the electric bike as stolen. Your insurer then contacts the recovery agency. The recovery agency will then try to locate and retrieve your electric bike. When you make use of this service, the recovery agency will notify the police. If the electric bike is not found then you must confirm the notification and file an official report with the police in connection with the financial settlement. Before the recovery agency can consult the details of your electric Connect bike, you have to first agree to the processing of location details of the module mounted in the electric Connect bike the purpose of which is to find the stolen electric Connect bike. After this has been provided to the recovery agency, the processing of the location and bike details by the recovery agency is carried out in accordance with the Police Data Act. If you do not find your electric Connect bike, you should disconnect the bike in the app.

# Cookies, web beacons and similar technologies

If you visit or use our websites, services, applications, communication services (such as email) and accessories, we may offer cookies, web beacons and other similar technologies for storing information in order to be able to provide you with a quicker and more secure browser experience.

Consult our GAZELLE Cookie Policy for an explanation of cookies, web beacons and similar technologies, how we use them and how you can manage them.

# Children

We advise parents to play an active role in monitoring the online activities of their children younger than 16. GAZELLE will under no circumstances try to collect the personal data of children and will not deliberately communicate with children. If we do, however, communicate with a child, we will give the parent or legal guardians the possibility to give permission before we use the personal data of the child, unless we are only responding to a question or wish of a child.

# **Policy amendments**

We may amend this Privacy Statement of GAZELLE from time to time. We will inform you of any changes in our Privacy Statement, but also ask you to regularly check the Privacy Statement. This Privacy Statement was changed for the last time on 15 March 2018.

# Your rights

You have at all times the right to access your personal data, to see the origins of this data, and to know the bodies receiving this data and the purposes for which your data is stored. You also have the right to request rectification, blocking and/or deletion of your data. You can do this by contacting the below email address.



# Questions, feedback and Data Protection Officer,

Send your questions and comments about privacy to privacy@pon.com. The Data Protection Officer can also be contacted via the above email address.