



Privacy Policy

AfterRace is committed to protecting your privacy. This notice explains how we collect and use your personal data. It also describes the rights you have and control you can exercise in relation to it.

This Privacy Notice was last updated on May 25th, 2018.

WHO WE ARE

afterrace.com is the first company that invented the Triathlon Series. The Board Game and is headquartered in 17 Bahluiului St., Bucharest, Romania. By using this Website, you are acknowledging and agreeing with the way in which we use your information as described in this Privacy Policy.

The terms "afterrace.com" and "the firm" mean the services we provide (also referred to below as "we", "us" or "our"). This Privacy Notice applies to the specific webpage www.afterrace.com referred to below as "this Website".

If you have any questions about afterrace.com' use of your personal data, please contact us using the following email address privacy@afterrace.ro

WHAT CATEGORIES OF PERSONAL DATA ARE WE PROCESSING?

The personal data that we process may include:

- ✓ **contact information** including your name, postal addresses for shipping or billing, phone number (including mobile phone where provided), email address, and other personal data (that you may provide);
- ✓ **information from public sources:** e.g. linked in and similar professional networks, directories or platforms;
- ✓ **events data:** attendance at and provision of feedback forms in relation to our events;
- ✓ **supplier data:** contact details and other information about you or your company or organization where you provide services to afterrace.com;
- ✓ **social Media:** posts, likes, tweets and other interactions with our social media presence;
- ✓ **data resulting from your browsing on our Website**, collected via cookies according to our Cookies Policy and our technology services being IP address, browser type and version (e.g. Internet Explorer, Firefox, Safari, etc.), time zone setting, browser plug-in in types and versions, operating system you are using (e.g. Vista, Windows XP, MacOS, etc.);
- ✓ **online data:** when you access this Website and our technology services, information about your visit including URL clickstream to, through and from our website (including date and time), information about your network as such as information about devices, nodes, configurations, connection speeds and network application performance; pages viewed or searched for, page response times, download errors, length of visits and interaction information (such as scrolling, clicks, mouse-overs) and whether you click on particular links or open our emails. As a visitor, you do not have to submit any personal information in order to use the Website. This Website only collects personal information that is specifically and voluntarily provided by visitors, except for the personal data collected by cookies. AfterRace does not collect personal data about your online activities across third party websites or online services.

PURPOSES FOR THE PROCESSING OF YOUR PERSONAL DATA

We may use your personal data for the following purposes:

- ✓ **Access to our online store services** - these being necessary for the execution of a contract to which the data subject is a party or to take steps at the request of the data subject prior to the conclusion of a contract;



- ✓ **Concluding sales contracts for our products** - these are necessary for the execution of a contract to which the data subject is a party or to take action at the request of the data subject prior to the conclusion of a contract;
- ✓ **Marketing and advertising** - on the basis of the consent granted by yourself or being used by us in legitimate interests, develop our relationship and target our marketing and promotional campaigns;
- ✓ **Business and contractual relationship**: managing our relationship with you, your company or organization including keeping records about business contacts, services and payments so we can customize our offering for you;
- ✓ **Communication** sending emails, newsletters and other electronic marketing materials relating to our products, market insights and of our services, to invite you to events hosted by us or in cooperation with us;
- ✓ **Events** organized and hosted by us;
- ✓ **Client surveys and feedback**: including events feedback and client listening exercises as well as answering issues and concerns which may arise;
- ✓ **Website monitoring**: to check the website and our other technology services are being used appropriately and to optimize their functionality;
- ✓ **Online security**: protecting our information assets and technology platforms from unauthorized access or usage and to monitor for malware and other security threats;
- ✓ **Managing suppliers**: who deliver services to us;
- ✓ **Legitimate interests**: to pursue the legitimate business interests.

LEGAL BASIS FOR THE DATA PROCESSING

Your personal data may be processed using the following legal grounds:

- ✓ your personal data sent to us voluntarily by you via this Website (for creating an online user account) are processed on the ground of **express consent**;
- ✓ the data is **necessary for us to perform the sales contracts for our products** with you or your organization;
- ✓ **compliance with our legal obligations** as well as to keep records of our compliance processes or tax records;
- ✓ **processing is necessary for our legitimate interests or those of a third party** provided that those interests are not overridden by your interests or fundamental rights and freedoms.

Special category of data in the EU and certain other jurisdictions refers to sensitive data such as your racial or ethnic origin, religious beliefs or health data. We do not collect this kind of data or data about criminal convictions. We will only process this data exceptionally where:

- ✓ **we have your explicit consent** for the particular processing;
- ✓ **this is necessary to protect your vital interests or those of another person**: for example, in medical emergencies; you have manifestly made the data public: e.g. where you have published it on social media;
- ✓ **this is necessary for substantial public interest**: e.g. to prevent or detect unlawful acts;
- ✓ **as permitted by applicable law**: outside the EU and other jurisdictions where these restrictions apply.

We have **legitimate business interests** in:

- ✓ providing our products;
- ✓ managing our business and relationship with you or your company or organisation;
- ✓ understanding and responding to inquiries and client feedback;
- ✓ understanding how our clients use our products, services and websites;
- ✓ identifying what our clients want and developing our relationship with you, your company or organisation;
- ✓ improving our products, services and offerings;
- ✓ enforcing our terms of engagement and website and other terms and conditions;
- ✓ ensuring our systems are secure;



- ✓ managing our supply chain;
- ✓ developing relationships with business partners;

- ✓ ensuring debts are paid;
- ✓ operating suppressors to exclude you from direct marketing if you unsubscribe;
- ✓ sharing data in connection with acquisitions and transfers of our business.

HOW LONG DO WE KEEP YOUR DATA?

We store your personal data as long as it is necessary to provide the products and conduct the transactions you have requested or for other essential purposes such as compliance with legal obligations, resolution of disputes and implementation of our agreements. Because these needs may vary depending on the different data types in the context of different products, actual retention periods may vary significantly. The criteria used to determine retention periods include:

- ✓ maintaining and improving product performance, maintaining our systems safely, and maintaining appropriate business and financial records;
- ✓ the period for which your consent is valid until you express your intention in one of the ways set forth in this policy of not retaining the data;
- ✓ if it's data that you have access to, the data will be stored until you delete it, e.g. deleting your online user account from our website;
- ✓ the situation where a law provides for the retention of personal data, for the maintenance of data relevant to an investigation or data to be kept in the event of a dispute.

The storage periods of your personal data vary according to the purpose for which they are used as follows:

- ✓ the purpose of providing access to online store services - for the duration of your online account;
- ✓ the goal of concluding sales contracts for our products - for a period of 10 years;
- ✓ the purpose of marketing and advertising - for the duration of your online account and for a period of 3 years after its closure or until your objections to such processing are resolved;

WITH WHOM DO WE SHARE YOUR DATA?

We may share your personal data with other as follows:

- ✓ **AfterRace members firm:** including our management, lawyers, staff and contractors in order to provide our products and services;
- ✓ **suppliers and service providers:** who support our business including IT and communication suppliers, outsourced business support, marketing and advertising agencies sending messages to customers, polling, courier services, and more, back up and DR suppliers. Our suppliers have to meet minimum standards as to information security and they will only be provided data in line with their function and we have not authorized any of these service providers to perform other operations with your information;
- ✓ if you choose to pay our products on our website, your personal data will be sent to an **electronic payment processor** who will not transfer all your payment information to us. For complaints and complaints about this information, please contact us or contact the payment processor directly;
- ✓ your personal information may be disclosed **in connection with your social sharing activity**, such as signing in to your client account in your social media account. By linking your client account and your social media account, you authorize us to share information with your social media provider and understand that the use of the information we share will be governed by the privacy policy of the social media site;
- ✓ **law enforcement bodies and our regulators:** or other competent authorities in accordance with legal requirements or good practice;
- ✓ **appropriate parties in the event of emergencies:** in particular to protect health and safety of our clients, staff and organisations;
- ✓ **your company or organisation:** in relation to us providing our products and services;



- ✓ **screening service providers:** so that we can comply with legal obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks;
- ✓ **advertising networks and analytics service providers:** to support and display ads on our website, apps and other social media tools;
- ✓ **third parties:** in the context of the acquisition or transfer of any part of our business or in connection with the business reorganisation;
- ✓ **other delegates:** where your name will appear on the attendee list for events where you have told us you plan to attend.

We will not transfer your personal data abroad, unless specifically indicated by you.

PERSONAL DATA ABOUT OTHERS

In some cases, you may provide personal data to us about other people (such as your customers, directors, officers, shareholders or beneficial owners). You must ensure that you have given those individuals an appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

Subject to the provisions of the legislation in force, you have the following rights in relation to the processing of your personal data:

- ✓ **access** to your personal data and the right to request a copy of your personal data which we hold;
- ✓ **correction** of any inaccurate or incomplete personal data;
- ✓ **object to or restrict** our use of your personal data;
- ✓ **erasure** of your personal data, when you withdrew your consent, the processing is no longer necessary, or such processing is unlawful;
- ✓ **data portability** which allows you to receive a copy of the processed data which we received from you or to share them with another entity nominated by you;
- ✓ **automated decisions** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered;
- ✓ **withdraw your consent** for the consent-based processing. Please note that withdrawal of consent shall not affect the lawfulness of processing based on consent before consent withdrawal. If you withdraw your consent, we will no longer process your personal data and we shall take the necessary measures to erase your personal data. We may however process your personal data if there is another legal basis for such processing.

If you wish to exercise the rights detailed above, please contact us using the following email address: privacy@afterrace.ro

You also have a right to lodge a complaint with a data protection supervisory authority, in particular in Romania you can make a complaint to The National Supervisory Authority for Personal Data (ANSPDCP), headquartered in 28-30 Gheorghe Magheru, District 1, postal code 010336, Bucharest, in the form of a written address at the headquarters of the institution or by e-mail at anspdcpl@dataprotection.ro. You are also granted the right to address to the courts to defence any rights guaranteed by the applicable law in the field of personal data protection that have been violated.

DIRECT MARKETING. HOW DO YOU CHOOSE THE PROMOTIONS YOU RECEIVE?

Our company wish to communicate with you only if you would like to do so and have expressed or express your consent (consent) to that effect. We may use the information you give us on our Website or other means for direct marketing purposes to provide emails, newsletters and other messages to keep you informed of our products, market insights and of our services including events that we think may interest you.



However, there is also the possibility that our company will deliver personalized offers to you if you have made an order at least once on our website without your subscription to the newsletter or if you have an online user account created in our Website (there is a contractual relationship to the use of the website), based on our legitimate interest in marketing and advertising.

You can opt-out of receiving direct marketing from us at any time. You can do this by clicking on the "unsubscribe" link included at the end of any marketing email we send to you, or by contacting us at privacy@afterrace.ro

INFORMATION SECURITY

We will hold your information securely in line with physical, technical and administrative security measures. However, the transmission of information via the internet is not completely secure. Although we will take reasonable measures to protect your personal information, we cannot guarantee the security of your information transmitted and any transmission is at your own risk.

We have in place reasonable commercial standards of technology and operational security to protect all information provided by visitors via this Website from unauthorized access, disclosure, alteration, or destruction. However, the transmission of information via the internet is not completely secure. Although we will take reasonable measures to protect your personal information, we cannot guarantee the security of your information transmitted and any transmission is at your own risk.

We will hold your information securely in line with physical, technical and administrative security measures. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

COOKIES

We use cookies that identify your browser. They collect and store information when you visit our Website about how you use it through which it is possible to record your use of the website, as well as provide you with a better service and experience when browsing and for analytics. The personal data we collect through these technologies will also be used to manage your session. For more information about cookies and how we use them, please see our Cookies Policy.

LINKS TO THIRD PARTY WEBSITES

Our Website, newsletters, email updates and other communications may, from time to time, contain links to and from the websites of others. The personal data that you provide through these websites is not subject to this Privacy Notice and the treatment of your personal data by such websites is not our responsibility.

If you follow a link to any other websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites.

CHILDREN

We do not knowingly collect information from children or other persons who are under 16 years old. If you are under 16 years old, you may not submit any personal data to us.

WHAT IS PHISHING?

"Phishing" is a scam designed to steal your personal information. If you receive an email that appears to be from us, asking for your personal information, you are not responding. We will never ask for your password, username, credit card information or other personal information by email.



CONTACT US

For questions about privacy policy, to make choices for receiving promotional communications, to update your personal information, or to place an order, you can contact us by e-mail, telephone or e-mail at:

email: info@afterrace.ro or privacy@afterrace.ro

phone: + 40726 257 847

postal address: 17 Bahluiului St., Bucharest, Romania

For further details on the rights you are entitled to under personal data protection or personal data protection claims, you may contact us by e-mail at: email: privacy@afterrace.com

CHANGES TO OUR PRIVACY POLICY

We may modify or amend this Privacy Policy from time to time at our discretion. When we will make changes to this Notice, we will notify you in accordance with the applicable legal provisions.