

Privacy Notice

1. Introduction

With this Privacy Notice we inform you about the privacy practices of Versuni (headquarters based at Claude Debussylaan 88, 1082MD, Amsterdam, the Netherlands) and its affiliates and subsidiaries, hereafter referred to as Versuni, our, we or us.

We appreciate the interest you have shown in our company, our products, our pages and services by visiting our website or other communication channels, including our apps, social media pages and/or channels and blogs.

This privacy notice applies to the personal data that we may process when you interact with us. With personal data we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may have.

To create a global approach for processing personal data and allowing personal data transfers between our group companies worldwide, Versuni has adopted a privacy policy and entered into an intra group data sharing agreement based on the most recent European standard contractual clauses.

You have shown your trust in us by interacting with us and we value that trust. We are committed to protect your privacy at all times. The European privacy regulation GDPR serves as a basis for our privacy policy and privacy practices.

2. What personal data do we collect and for which purpose?

Account Data

When you decide to create an account with us, we may collect the following personal data: first name (optional), last name (optional), profile name (optional), email address, mobile phone number (depending on the country), social media account data (in case you create the account through your Social Media account, we receive your data from your Social Media Provider), your country and language, date of birth (optional).

You are in control over which data you share with us when creating your account. You can delete your account at any time when you log in and select delete my account under settings.

You may use the account to register your products with us for (extended) warranty, to use our mobile apps, to purchase our products and services and consult your order history. You may also manage your subscriptions with your account and/or participate in our tests and/or promotions and/or provide your feedback to us. In case you are using our apps, you can select your appliances and mark your app content interests with your account.

We may use this personal data to communicate with you, identify you and assign the data we have available on you in our databases. With the account, your marketing preferences will be managed.

We consider the processing of your account data to be necessary for the performance of the contract to which you are party.

Purchase & Registration Data

When you purchase our products/services in our online stores, we may collect the following personal data: shipment and invoice address, phone number, invoice history (overview of our products/services purchased), details of your product/service (e.g. the name of the product/service, the product category, the product model number, date of purchase, proof of purchase).

We may use this personal data to fulfil your purchase and/or register your product.

We consider the processing of your purchase and registration data to be necessary for the performance of the contract to which you are party.

Feedback Data

You can choose to give your feedback, comments, questions, ratings and reviews in (online) evaluations (feedback). When you do so, we may process the following personal data: your cookie ID; the content of your feedback; your contact details in case you provide them to us.

We may use this personal data to gain valuable insights and to improve our pages, products and services.

We consider the processing of your feedback data to be based on your consent and our legitimate interest.

Social listening Data

When you interact or communicate on social media channels/pages/promotions and blogs (e.g. when you click on 'like' or 'share', when you post and share comments, when you submit ratings and reviews) your personal data may be processed by a third party that provides social listening services to us. This means that the third party that provides social listening services, will retain a copy of your online publicly available interactions, and provide us access to this.

The personal data we may process in this respect, includes publicly available data provided by you in the social media context. This may include data such as: name, gender, birthday, age, homepage, profile photo, time zone, mail address, country, interests, comments and content you have posted/shared.

We may use this personal data to gain insight in the public opinion about us, to be up to date with online influencers, to resolve issues, to improve our pages, products and services, and/or to start a promotional conversation with you (based on questions/requests that you addressed to us or our competitors).

We consider the processing of social listening data in the above context to be based on your consent and our legitimate interest.

Customer Care Data

When you communicate with our Customer Care by email, phone, chat or in writing, we may process the following personal data: your call recording, communication history, purchase history, your experience, the content of your questions.

We may use this personal data to provide you with support, respond to your inquiries, fulfil your requests and provide you with services (such as repair or redeem products/services). We may also use this personal data to improve, fix and customize our products and services, to meet compliance standards and to educate our Customer Care agents with training.

We consider the processing of your personal data to be necessary for the performance of the contract to which you are party. In other cases, we consider this processing of your personal data to be based on our legitimate interest.

Third-party cookies and other tracking technologies

While you are using our products/services and/or visiting our webpages, we may use cookies or similar tracking technologies. In most cases we will not be able to identify you directly from the information we collect using these technologies.

You can decline or delete cookies if you wish; while certain cookies are necessary for viewing and navigating on the websites or apps, most of the features will be accessible without cookies. We refer to our Cookie Statement and our Cookie Notice at the applicable touchpoint for more information.

We may use your personal data for analytical purposes, to improve our pages, products, services and/or to measure and enhance the overall user experience. We may process your personal data to gain insight into which audiences may be interested in our pages, products and/or services. We may also use cookie data to connect to your social media network and read reviews and/or to tailor advertising to your interests, both within and beyond our digital channels.

We consider this processing of your personal data to be based on your consent and our legitimate interest.

Sensitive Data

Although it is not intended, we may collect information that could reveal details about your health while providing services to you. Such information is considered sensitive personal data. In general, we request you to refrain from sharing sensitive data with us, unless this should be necessary in the given context.

We only collect sensitive data when you have given your explicit consent, when this would be necessary, or after you have deliberately made it public. We consider the processing of your sensitive personal data as described above to be necessary for the performance of the contract to which you are party or (as the exceptional case may be) to be based on our legitimate interest.

3. Sharing your Personal Data

As mentioned before, we value the trust you have put in us while sharing your personal data. We would like to inform you that we may disclose your personal data to others. This means, we may share your personal data – to the extent necessary – with:

- our affiliates and subsidiaries, for the purposes described in this privacy notice;
- our third-party service providers, who provide services such as website hosting, data analysis, payment/billing processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, CRM, identity management, event management, marketing intelligence, auditing, fraud detection and other services;
- third parties, to permit them to send you marketing communications, consistent with your choices (after we have informed you about this and you have opted in);
- your connections associated with your social media-account, other website users and your social media account provider, in connection with your social sharing activity.

We may also process and disclose your personal data as necessary:

- To enforce our terms and conditions;
- To comply with applicable law;
- To respond to requests from public and government authorities;
- To cooperate with law enforcement;
- For other legal reasons;
- To protect the rights, privacy, safety, or property from us and/or you or others.

In addition, we may use, disclose, or transfer your personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all, or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Third-party services

This Privacy Notice does not address, and we are not responsible for, the privacy practices, information, or other behavior of third parties, including any third party operating any website or service to which our webpages link. It is important to note, that the inclusion of a link on our webpages or devices does not imply endorsement of the linked site or service by us.

We are not responsible for the data collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other third party such as app developers, app providers, social media platform providers, operating system providers, wireless service providers or device manufacturers, including with respect to any personal data you disclose to other organizations, through or in connection with our webpages. These third parties may have their own privacy notices, statements, or policies. We strongly suggest that you review them to understand how your personal data may be processed by them.

4. How we protect Personal Data

We apply organizational, technical, and administrative measures to protect personal data trusted to us. Unfortunately, no data transmission or storage system is guaranteed 100% secure. If you have reason to believe that your interaction with us is not secure, please connect with us without delay.

How long will the personal data be kept?

We will retain your personal data for as long as needed or permitted considering the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable considering our legal position (e.g., statutes of limitations, litigation, or regulatory investigations). Upon expiry of the retention period, your personal data will be deleted and/or rendered non personal.

Jurisdiction and cross-border transfer

Your personal data may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our webpages, products and services, you consent to the transfer of your personal data to countries outside of your country of residence, which may have data protection rules that are different from those of your country. In certain circumstances, the courts, law enforcement agencies, regulatory agencies or security authorities in those countries may be entitled to access (part of) our databases.

If you are in the EEA, your personal data may be transferred to non-EEA countries that are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. In exceptional circumstances, your personal data may also be transferred to countries that are not considered adequate by the European Commission. For transfers from the EEA to such countries not considered adequate, we have put in place adequate measures to protect your personal data, such as standard contractual clauses adopted by the European Commission.

5. Your rights and choices

If you would like to submit a privacy request under applicable law, you may contact us through versuni.com/contact. We will respond to your request in accordance with applicable law.

In your request, please make clear what personal data you would like to have changed, whether you would like to have your personal data deleted from our databases, or otherwise let us know the specific nature of your privacy request. For your protection, we may only implement requests with respect to the personal data associated with your account, your email address or other account information that you used to send us your request, and please note we may verify your identity before implementing your request.

Please also note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to submitting your request. There may be residual information that will remain within our databases and other records (e.g., back-up).

If you have opted in and no longer want to receive marketing-related email from us, you may opt-out by clicking the unsubscribe button at the bottom of each promotional email you receive from us. We will comply

with your request(s) as soon as possible. It may happen you will still receive a limited number of promotional messages, before the opt out is in effect. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you administrative messages, from which one cannot opt-out.

If you make use of your choices and privacy rights, you may not be able to use, in whole or in part, certain of our products or services.

6. Special information for parents

Our pages, products and services are not directed to children, as defined under applicable law. It is not our intention to process personal data from children/minors. It is our policy to comply with applicable law when it requires parent or guardian permission before collecting, using, or disclosing personal data of children. We encourage parents and guardians to take an active role in their children's online activities and interests.

If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us.

7. Contact us

If you have any question or concern about this privacy notice or the way we process your personal data, please contact us through the Versuni customer care options available in your country (by phone, email or chat).

You can also contact our Data Protection Officer in the Netherlands through regular mail to Versuni, attn. Group Legal (Privacy), Claude Debussylaan 88, 1082 MD Amsterdam, the Netherlands.

Under applicable law, you have the right to lodge a complaint with a supervisory authority competent for your country or region.