
DIMENCO PRIVACY POLICY

Last modified on 12/07/2018

INTRODUCTION

Dimenco respects the privacy of our users, customers and other business relations and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy. This Privacy Policy is intended to describe for you, as an individual who is a user of a Dimenco Product or any of our related Sites, or other (online) services, the Personal Data we collect, how that information may be used, with whom it may be shared, and your rights and choices about such uses and disclosures.

CONTACT US

If you have any request with respect to your Personal Data collected by us or any questions about this Privacy Policy, or if you would like to contact our Data Protection Officer, please refer to the end of this Privacy Policy for information on how to contact us.

SCOPE OF THE POLICY

This Privacy Policy applies when Dimenco is acting as a data controller of your Personal Data, including with respect to each of our Sites and Products. In other words, where we determine the purposes and means of the processing of your Personal Data.

DEFINITIONS

In this Privacy Policy we use the following definitions:

- **“Data Protection Officer”** means the person appointed by Dimenco from time to time as its data protection officer, whose contact details can be found at the end of this Privacy Policy;
- **“Dimenco”, “we”, “us” and “our”** means Dimenco Holding b.v. and each of its subsidiaries from time to time (including Dimenco Displays b.v., Dimenco R&D b.v. and Dimenco Content Production b.v.);
- **“Personal Data”** means any information relating to an identified or identifiable natural person, and an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **“Privacy Policy”** means this Personal Data privacy policy of Dimenco, as may be amended from time to time;
- **“Products”** means each and any of our products and services (including WeShare3D, @Depth and Simulated Reality); and
- **“Sites”** means each and any of the websites, mobile applications and TV applications that we operate from time to time.



I. PERSONAL DATA THAT WE COLLECT

INFORMATION YOU PROVIDE

We collect your Personal Data on our Sites, via email, call center and post. We receive your information in the first place if you share it with us by:

- Contacting us via the contact form on any of our Sites, by e-mail, by telephone or by post;
- Filling in a form on any of our Sites;
- Requesting content or software (e.g. brochures or drivers);
- Signing up for email communications;
- Ordering any of our Products;
- Asking for service support;
- Making any payment to us;
- Visiting and using any of our Sites;
- Making any personal profile on any of our Sites; or
- Posting or publicizing data on any of our Sites.

INFORMATION WE RECEIVE

In the above cases, we usually receive information such as your first name, last name, e-mail address, telephone number, address details (street, number, postcode, city, country), and in case of any payment, also your banking details.

When making enquiries with us we may also receive the name of your employer and your job position, your preferred language, and the project or the region in which you are interested in.

From our Sites' usage and technical data we may obtain your device identifier or IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use of the Sites and our Products.

When you make a personal profile or post or publicize anything on one of our Sites, we may possibly also receive your profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. In addition, we will receive any other Personal Data that you may choose to share with us.

INFORMATION FROM OTHER SOURCES

Sometimes we also receive your Personal Data from affiliated companies or from professional data suppliers. This can, for example, be via tradeshows or via partnerships.

II. USE OF YOUR PERSONAL DATA

Unless prohibited under applicable law, we may use your Personal Data for the following purposes:

- Fulfilling any contract with you or providing you with any of our Products;
- Responding to any of your requests (including requesting a brochure, ordering a Product, asking to be kept informed of our activities, projects, offers, events, actions and so on);
- Responding to any questions or complaints raised by you via post, telephone, e-mail or any of our Sites;
- Communicating with you about your user account or any of your transactions with us;
- Managing any of your user accounts that you maintain in relation to any of our Sites or Products;
- Sending you information, offers and promotions about any of our Products or Sites;
- Personalizing content and experiences on our Sites;
- Optimizing and improving our Products or the functionality of our Sites;
- Notifying you of any changes to our user policies or controls available to you on any of our Sites; or
- Detecting, investigating and preventing activities that may violate our policies or be illegal.

III. SHARING OF YOUR PERSONAL DATA

We may share your Personal Data within the Dimenco group insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Privacy Policy.

We may share your Personal Data with our authorized service providers that perform certain services on our behalf – these are companies that have signed a processor agreement with Dimenco and who are obliged to comply with this Privacy Policy.

These services may include fulfilling orders, processing credit card payments, delivering packages, providing customer service and marketing assistance, performing business and sales analysis, supporting our website functionality, and supporting contests, sweepstakes, surveys and other features offered through our website. These service providers may have access to Personal Data needed to perform their functions but are not permitted to share or use such data for any other purposes.

These service providers shall process your Personal Data in accordance with the terms of this Privacy Policy and they shall retain your Personal Data at the most as long as the term of the data processing contract concluded with them is valid and in force, unless they are required to retain your Personal Data for a longer period under the applicable data retention laws.

IV. TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA

We may transfer your Personal Data outside of the European Union/European Economic Area where it is necessary to fulfil our contractual obligations to you or where we are required to achieve compliance with applicable laws and regulations.

In connection with providing you with our Products, we may be required to send your Personal Data to countries outside of the European Union/European Economic Area to countries which have not been deemed to have adequate standards of data protection. When we do so, we will consider the risks prior to such transfer, and ensure that an appropriate safeguard or another lawful mechanism is in place before sending your Personal Data.

V. RETENTION OF YOUR PERSONAL DATA

Dimenco will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

If no legal retention period applies, Dimenco will process your Personal Data at least as long as it has a contractual relationship with you.

VI. SAFEGUARDS FOR PROTECTING YOUR PERSONAL DATA

Dimenco strives to protect your Personal Data by means of technical and organisational measures, such as firewalls and secured servers that may only be accessed by a limited number of persons holding special access rights and with respect to the nature of the data. This is all noted and controlled by our Data Protection Officer and regularly checked.

Despite these measures, due care should be taken when storing or sharing your Personal Data and login, particularly when connecting to us or any of our Sites via unsecure or public networks, since we cannot guarantee that information you supply won't be intercepted while being transmitted to us over the internet.

VII. LEGAL BASIS OF PERSONAL DATA PROCESSING

We process your Personal Data on the basis of your consent, the performance of a contract to which you are a party, your request to take steps prior to entering into a contract, or our legitimate interests, namely the proper administration of our Sites and business.

VIII. YOUR RIGHTS AS DATA SUBJECT

With respect to your Personal Data that is controlled by us, you have the right, at any time, to:

- Request access to and the origin of your Personal Data;
- Request rectification of your Personal Data;
- Request erasure of your Personal Data;
- Request restriction of processing of your Personal Data;
- Request portability of your Personal Data;
- Object to the processing of your Personal Data (including objection to profiling; also other rights in connection with automated decision-making);
- Withdraw your consent with respect to us processing your Personal Data; and
- To lodge a complaint with the supervisory authority regarding our processing of your Personal Data.

The requests, objections and withdrawal of consent set forth above should be made in writing and be directed to our Data Protection Officer, whose contact details can be found at the end of this Privacy Policy. We shall comply with such requests, objections and withdrawal to the extent required by applicable law, and within a reasonable period of time.

You may, of course, at any time decline to submit Personal Data to us through our Sites or Products or otherwise, although in such case we may not be able to provide you with our Products or access to our Sites, or you may not be able to enjoy the full functionality of our Products and Sites.

IX. PRIVACY CONTROLS AND COOKIES

To unsubscribe from any of our newsletters, click the “unsubscribe” link at the bottom of that email newsletter.

Our Sites incorporate privacy controls which affect how we will process your Personal Data. By using the privacy controls, you can, amongst others, specify whether you would like to receive direct marketing communications and limit the publication of your information.

We use cookies on our Sites. Insofar as those cookies are not strictly necessary for the operation of our Site and provision of our Products, we will ask you to consent to our use of cookies when you first visit the Site. We use cookies for the following purposes:

- Identifying you when you visit and navigate any of our Sites;
- Determining if you are logged onto any of our Sites;
- Storing information about your preferences and personalizing our Sites for you;
- Helping us to protect our Sites and Products, including preventing fraudulent use of login credentials;
- Showing you advertisements that are likely to be relevant for you;
- Analysing the use and performance of our Sites and Products; and
- Storing your preferences in relation to the use of cookies.

X. CHANGES TO THIS PRIVACY POLICY

From time to time, we may change this Privacy Policy by giving notice to you on our Sites, in order to accommodate new technologies, industry practices, regulatory requirements or for other purposes.

If you object to any change to this Privacy Policy, you may need to cease using our Products and Sites, and you may request the Data Protection Officer to erase your Personal Data. Unless stated otherwise, the then-current Privacy Policy applies to all your Personal Data.

XI. MINORS UNDER 18 YEARS OLD

Our Products and Sites are not targeted to, intended to be consumed by or designed to entice individuals under the age of 18. If you know of or have reason to believe anyone under the age of 18 has provided us with any Personal Data, please contact our Data Protection Officer.

XII. CONTACT

You may contact our Data Protection Officer at any time about how we process your Personal Data, to exercise your rights as a data subject (see section VIII above) and with any questions about this Privacy Policy, by writing to the following address:

Data Protection Officer

Dimenco Holding b.v.

De Run 4281

5503 LM Veldhoven

The Netherlands

Or alternatively by emailing the Data Protection Officer at: privacy@dimenco.eu.