

Privacy Policy

This privacy policy describes the manner in which Shimano Europe B.V. protect and process (personal) data concerning European residents obtained through Shimano's Fishing Apps (collectively, the "Apps").¹

The basic mind-set of Shimano in respect to the protection and processing of (personal) data concerning European residents can be summarized as follows:

1. Shimano Europe B.V. is the controller within the meaning of the European General Data Protection Act ("GDPR") for the handling of personal data concerning European residents obtained through the App(s) in compliance with the obligations set forth by relevant data protection law such as the GDPR, as well as this privacy policy. Which entity is the controller depends on the App you are visiting. Moreover, depending on the processing activity, other companies within Shimano may be joint controller(s). Please contact us at privacy@shimano-eu.com, if you wish to obtain more information.
2. Shimano will acquire personal data by lawful and fair means.
3. Shimano will utilize personal data upon making clear the purpose of utilization, and will only use the personal data within the scope of the purpose.
4. Shimano will not provide acquired personal data to a third party, except in cases in described in this privacy policy or the cookie policy.
5. Shimano will appropriately manage personal data in order to secure its accuracy, and will also take reasonable safety measures in order to prevent leakage, loss, damage, etc. of personal data.
6. Shimano will manage personal data appropriately and take reasonable safety measures when personal data is utilized internally within the group or by third parties within the scope of its purpose of utilization or if personal data handling is outsourced.
7. Shimano will announce the procedures regarding inquiries and requests for disclosure of personal data that Shimano possesses, and will respond promptly and sincerely to such requests. If you accidentally send your inquiry or request to the wrong group company of Shimano, we will take care that such inquired or request will be redirected to the correct group company.
8. In order to implement the aforementioned policy items, Shimano has assigned a privacy department, which can be reached at privacy@shimano-eu.com.
9. Shimano will continuously revise and improve its personal data management system and structure in order to effectively protect personal data in accordance with future changes in laws or circumstances.

Please be sure to read this entire privacy policy before using or submitting information to the Sites. For more information on Shimano's use of cookies an similar technologies, please refer to our cookie policy.

1. Legal basis

We will process your personal data obtained through the App(s) in accordance with applicable law, including the GDPR. When we process your personal data, such processing will be based on any of the following grounds listed in the GDPR:

- (a) your consent;

¹ Please note that this privacy policy also applies to any processing of personal data concerning non-EU residents obtained through the Apps to which the GDPR applies.

- (b) the performance of a contract to which you are a party (or in order to take steps at your request prior to entering into a contract);
- (c) compliance with a legal obligation to which Shimano is subject;
- (d) in order to protect the vital interests of you or of another natural person; or
- (e) legitimate interests of Shimano or a third party.

2. Purposes for which your personal data may be processed

We may process your personal data obtained through the App(s) for the following purposes:

- (a) to send you information requested by you;
- (b) to manage your Shimano account (if any);
- (c) to analyze your use of our products and services for quality control, product development and marketing purposes;
- (d) to send newsletters and commercial messages to you, which messages may be specifically tailored for you based on the type of services and products purchased by you and your use thereof;
- (e) to organize joint marketing events with third parties;
- (f) to satisfy statutory obligations of Shimano, such as obligations regarding bookkeeping and tax law;
- (g) to enable Shimano to perform possible product recalls and to enforce and defend its rights in disputes;
- (h) for any other purposes made known to you beforehand.

3. Types of personal data we process

We may collect your personal data in the following manner(s):

- (a) When you create and maintain a Shimano account, either via email or by logging in via Facebook, you may be asked to provide certain personal data, such as name, user name, email address and password, and to keep such personal data up to date.
- (b) When you use the App(s), our servers automatically record certain data, such as IP address and the date and time of your visit. Also, we may collect personal data concerning your use of the Site. Your personal data is obtained by cookies and similar mechanisms. The Sites will inform you of our use of cookies and similar mechanisms.

When we ask you to submit your personal data, we will indicate which data fields are optional. If you fail to provide us with the obligatory information, we may not be able to adhere to your request (e.g. to create a Shimano account).

Depending on the purpose of processing, Shimano may process the following personal data from you: name, contact information (including telephone number and e-mail address), shipping and billing address,

date of birth, gender, the sort of products or services purchased or used by you, specific requests made by you, payment information (such as credit card information), and specific information that is requested or generated in order to use or benefit from a product or service (e.g. bike fitting), such as bodyweight, length, etc.

We will not store your personal data for a longer term than necessary for compliance with the storage terms provided for by law and the fulfilment of the purposes as mentioned in this privacy policy.

4. Sharing of personal data

In the event that you provide personal data on the App(s), in particular your name, address, telephone number, gender, date of birth, occupation, e-mail address, your response to surveys or competitions, and your requests, we may share internally such personal data. In addition, personal data (e.g. IP-addresses) collected by means of cookies and similar technologies may be shared if you applied the respective approvals. Where we share your personal data within our group, the following principles will be adhered to:

- (a) All Joint Users of Personal data, meaning the group companies working for and with Shimano Europe B.V., must comply with our privacy policy, and are not permitted to sell or otherwise disclose your personal data to third parties except as authorized by Shimano Europe B.V. and you, or as permitted or required by applicable law.
- (b) Shimano has applied adequate safeguards to ensure organizational and technical security measures, including by agreeing on standard contract clauses if your personal data is transferred to group companies that are established outside the EEA.
- (c) See Here for More Details on Joint Users of Personal data

We may share your personal data, such as your name and e-mail address, with third parties not affiliated with us if you have consented to receive e-mail offers from such third parties. See Section 5 for more details. In addition, Shimano may share your personal data to your credit card company, bank or another payment service provider in the context of a transaction. See Section 6 for more details. In exceptional circumstances, Shimano may share your personal data with other third parties. See Section 7 for more details.

We may make use of processors to support certain of our business functions, such as IT providers that offer storage services. If and insofar as these third parties process your personal data while doing this, they will do so on the basis of a processing agreement in accordance with the GDPR.

We may also share anonymous, aggregate (demographic) information with third parties, such as our distributors, our sponsors, promotional and business partners, and participating vendors.

5. Marketing

We may use your contact information to send you newsletters and commercial emails, such as to inform you about new developments in relation to our products and services. Also, we may extend e-mail offers to you on behalf of business partners about a particular product or service that may be of interest to you, without sharing your name or e-mail address with or disclosing your name or e-mail address to those business partners. Where required under applicable law, we will only send you such commercial emails if you have consented to receiving such emails.

Sometimes we will give you the opportunity to opt in to receive e-mail offers from third parties not affiliated with us in accordance with applicable laws. If you decide to accept these offers, we will provide, upon your consent, your contact information to the third party. We urge you to review carefully the privacy policies of these firms. We are not responsible for the privacy policies and procedures of any third party.

At any time you may notify us that you no longer wish to receive newsletters or other commercial messages from us via email. We will process your notification in due course and remove you from our mailing list.

6. Credit card companies, banks and other payment service providers

In the event that you choose to transact using a credit card or debit card, we will supply to your credit card company, bank or other payment service provider all relevant information about the name of the vendor, item(s) purchased, purchase date, total cost and other information necessary to process the transaction. Shimano will not otherwise provide any personal data to your credit card company, bank or payment service provider without your permission.

7. Disclosure to third parties

We will not disclose your personal data to any third parties other than your credit card company, bank or other payment service providers or our processors without your consent; provided, however, that we reserve the right to use or disclose to a third party any information without your consent in the following circumstances:

- (a) If it is requested by any laws and regulations, in order to comply with legal obligations Shimano is subject to;
- (b) If we deem it necessary for protection and security of vital interests of you or third parties, including human life, body or assets (including the Sites), such as for improvement of public health or
- (c) If we deem it particularly necessary for cooperation with a governmental body or other public organization or its designee in discharging its duties pursuant to the laws and regulations (including investigating breach of laws), or otherwise deems it particularly necessary for the performance of a task carried out in the public interest;
- (d) If we outsource the handling of personal data to the extent necessary for its business operation.

We will use best efforts to inform you prior to such disclosure, including of the recipient of your personal data, by means of this privacy policy or, if appropriate, we will make efforts to inform you via other methods (e.g. email) when you are a registered visitor.

8. Cookies

We may collect and process information, including personal data, using cookies and similar technologies when you visit and use the Site. For example, we may collect IP address and the date and time of your visit. Also, we may collect personal data concerning your use of the App. Please go to our cookie policy for a detailed overview on we handle cookies and similar technologies.

Moreover, our advertising partners may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement. In this way, ad servers may compile information about where you, or others who are using your computer, saw their advertisements and determine which ads are clicked on. This information allows an ad network to deliver targeted advertisements that they believe will be of most interest to you. Please go to our cookie policy for more information.

9. Security of personal data

We maintain state of the industry security measures to avoid unauthorized access to, alteration, disclosure or loss of your personal data. For example, we use Secure Sockets Layer (SSL) technology to encrypt important information, such as your credit card data, in an effort to prevent unauthorized access during transmission of your orders over the Internet. We implement standard industry practices internally and with our service providers to maintain the security of your personal data depending on its sensitivity and to avoid disclosure of such personal data unpermitted under this privacy policy.

Although we have implemented systems and procedures to secure the data maintained by us, security during Internet transmissions can never be assured. Shimano employees are made aware of our privacy practices through periodic communications and training. Our policy is to limit access to personal data to those Shimano employees or agents with a specific need to access or retrieve the information. We store data on multiple service systems, in controlled environments. To maintain security, we conduct internal reviews of our security measures on a regular basis. Please note, however, that any personal data you post in chat rooms or message boards is available to anyone. While we have taken commercially reasonable precautions to safeguard personal data, we cannot and do not guarantee complete security of personal data because complete security does not presently exist on the Internet.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. We also recommend not to re-use passwords on other websites.

10. Transfer of personal data

We may transfer your personal data collected through the App(s) to, and store at, a destination outside the European Economic Area ("EEA"). For example, Shimano staff working outside the EEA may access and further process your personal data. Shimano will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy policy and applicable data protection laws, including the GDPR. For example, Shimano may use contracts approved by the European Commission for the transfer of data to such destinations.

11. Links to websites of others

The Sites may contain hyperlinks to third party websites, or embedded content of third party websites. The privacy policy of third parties are subject to the processing of personal data by third parties. Shimano is not responsible for the content of these third party websites and the processing of personal data by these third parties.

12. Children

We will not knowingly collect personal data via the Sites from visitors younger than eighteen (18) years of age. We encourage parents to talk to their children about their use of the Internet and the information they disclose on websites. If you are younger than 18 and wish to visit the App(s), you may only provide your personal data to Shimano if you have obtained permission from your parent(s) or your legal representative(s).

13. Changes in corporate structure

In developing our business, we may engage in the sale or transfer of certain assets and Shimano itself, or parts of it, may be sold, merged or otherwise assigned. In such transactions and changes in ownership, user data, whether personal or otherwise, may constitute one of the transferred assets. If required by law, we will notify you of such transfer or assignment in accordance with the procedure for changing this privacy policy described in section 15 below.

14. Your rights

You have the right to request from Shimano access to and rectification or erasure of personal data or restriction of processing concerning you or to object to processing as well as the right to data portability.

Where the processing of your personal data is based on your consent, you have the right to withdraw the consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

You have the right to lodge a complaint about our processing of your personal data with the Dutch Data Protection Authority (Autoriteit persoonsgegevens) or the possible competent supervisory authority in your country.

You may invoke any of these rights by sending your request to: privacy@shimano-eu.com.

We reserve the right to refuse any requests if your identity cannot be demonstrated by you and/or we can invoke any of the exceptions stated in the GDPR. In such case, we will inform you of the refusal.

15. Changes to our privacy policy

We will occasionally update this privacy policy as necessary to protect our users and to accommodate a changing environment. The changes to our privacy policy will be deemed to be effective from the date of posting on our Sites unless we specify otherwise. We recommend that you check the privacy policy when you visit our Sites to be sure that you are aware of and understand our current privacy policy. If we make material changes to this privacy policy, we will make efforts to prominently post such changes prior to implementing the change. We will not make any retroactive material changes in how we handle previously collected personal data unless you allow us to do so, or unless we are legally required to do so, and in such a case we will make efforts to inform visitors of information on material changes to this privacy policy.

16. Contact information for questions or complaints

Please contact our privacy department if you have any questions, comments or complaints regarding this privacy policy, our privacy practices or our treatment of your personal data, using the following contact details:

privacy@shimano-eu.com.

This privacy policy was last updated on 22 February 2019.