

Ping Europe Limited (“PING,” “us” or “we”) is committed to protecting your privacy. PING has prepared this privacy policy to describe to you or, if you represent an entity or other organisation, that entity or organisation (in either case, “You” or “User”) our practices regarding the personal data that PING collects, uses and shares regarding our online informational platform (the “Platform”) accessed through the website located at <https://ping.com/> and any other websites operated by PING (each a “Site”) or using mobile applications provided by and on behalf of PING (each an “Application” and each Site and Application treated as a part of the “Platform” for purposes of this privacy policy). This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how PING collects and processes your personal data.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

Ping Europe Limited is made up of different legal entities. It encompasses Thonock Park and Ping Scandinavia AB (which is a wholly owned subsidiary of Ping Europe Limited). This privacy policy is issued on behalf of all such entities, so when we mention PING, “we”, “us” or “our” in this privacy policy we are referring to the relevant company or entity in PING responsible for processing your data. Ping Europe Limited is the controller of your data.

Changes to the privacy policy and your duty to inform us of changes

PING reserves the right, at any time, to modify this privacy policy. If we make revisions that change the way we collect, use, or share personal data, we will post those changes in this privacy policy. You should review this privacy policy periodically so that you keep up to date on our most current policies and practices. We will note the effective date of the latest version of our privacy policy at the end of this privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not

responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data refers to information that is connected to you, or from which a person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (except information about your health where you provide it to us for any applicable or necessary reason, for example Thonock Park membership suspension). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** We may automatically collect Technical Data about your equipment, browsing actions and patterns by using the following automated technologies or interactions:
 - **Cookies.** "Cookies" are small bits of information that the Platform places on the hard drive of your computer. Cookies remember information about your activities on the Platform to make your visits to the Platform more enjoyable and valuable to you by providing a customised experience and recognising your preferences when you visit the Platform. We may also receive Technical Data about you if you visit other websites employing our cookies.
 - **Flash cookies (also called Local Shared Objects or "LSOs").** Flash cookies are data files similar to cookies, except that they can store more complex data. Flash cookies are used to remember settings, preferences, and usage, particularly for video, interactive gaming, and other similar services.
 - **Web beacons or clear pixels.** Web beacons are small graphic images on a web page or in an email that can be used for such things as recording the pages and advertisements that You select or tracking the performance of email marketing campaigns.
 - **Web server logs.** Web server logs are records of activity created by the computer that delivers the webpages you request to your browser. For example, a web server log may record the search term you entered or the link you clicked to bring you to a webpage. The web server log also may record information about your browser, such as your IP address and the cookies set on your browser by the server.

- **Social networking sites.** If you log into any part of the Platform through sign-in services (such as Facebook Connect), you provide PING with permission to access certain information about you from that social networking site, such as your Facebook User ID, user profile, friends list and profile picture.
- **Device Information.** We may collect information about the mobile device or computer you use to access the Platform, including without limitation the hardware model, operating system and version, browser type, unique device identifiers, and mobile network information.
- **Geo-location Information.** We may collect information about the geo-location of your device if you provide your consent. When you install the Application you will be reminded by the Application of that the device may be tracking your geo-location, and asked to provide your consent.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from analytics providers such as Google Analytics based outside the European Union (**EU**), from advertising networks such as Facebook, Twitter, Instagram, , YouTube and various other social media partners] based inside and outside the EU, and from search information providers such as Google, Yahoo and Bing] based outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Credit Assist or QBE Insurance based inside and outside the EU.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

PING will only use your personal data when the law allows us to.

PING will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you. For the purposes of this privacy policy, performance of a contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For the purposes of this privacy policy, legitimate interests mean the interest of our business in conducting and managing our business to enable us to give you the best products/services and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our

legitimate interests against any potential impact on you in respect of specific activities by contacting us at the address listed below or email us at info@pingeurope.co.uk

- Where we need to comply with a legal or regulatory obligation. For the purposes of this privacy policy, comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

We do not rely on consent as a legal basis for processing your personal data. You have the right to update your preferences or unsubscribe from receiving marketing communications at any time by updating or unsubscribing on the email you receive, by contacting us at the address listed in section 10 or by emailing at info@pingeurope.co.uk.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at the address listed below or email us at info@pingeurope.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records)

<p>(b) Asking you to leave a review or take a survey</p> <p>(c) Notifying you of new price lists and terms and conditions (or variations)</p> <p>(d) Providing you with important business updates and new brochures</p>		<p>updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you (including the collection of email addresses, phone numbers and user ID's from you and uploading of such email addresses, phone numbers and user ID's into social media and digital advertising platforms for adverts to be delivered to you via those platforms)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to continuously develop our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website</p>

relationships and experiences		updated and relevant, to develop our business and to continuously develop our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

PING may share your personal data with companies that are affiliated with us (i.e. that control, are controlled by or are under common control with PING). We do not share your information with third parties to directly market to you.

Opting out

You can ask us to stop sending you marketing messages at any time by logging into our website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at the address listed below or email us at info@pingeurope.co.uk at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you have chosen to disable cookies on your browser,

some parts of the Platform may become inaccessible or some of the functionality of the Platform may be lost. Certain services provided by PING, require that cookies be enabled in your browser and cannot be used when you have disabled cookies in your browser.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the address listed below or email us at info@pingeurope.co.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers acting as processors who provide warehousing and delivery, IT and system administration services. PING may disclose personal data to service providers for the purposes of operating our business, delivering, improving, and customising our content, products or services, sending marketing and communications related to our business, payment processing and for other legitimate purposes permitted by applicable law. Additionally, PING contracts with payment processing providers which may process sales and orders that users make through the Platform. Personal data handled by service providers is subject to their terms and privacy policies. Please review the service provider's terms and privacy policies to better understand how they manage your personal data.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services. There may also be instances when PING may disclose your personal data without providing you with a choice, in order to protect the legal rights of PING, other affiliated companies or their employees, agents, and contractors; to honour a request that you have made through the Platform; to protect the safety and security of other users; to protect against fraud or for risk management purposes; or to comply with the law or legal process.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- The Platform may offer you the ability to share your personal data through a social networking site (e.g. Facebook, Twitter or LinkedIn) using such site's integrated tools (e.g. Facebook "Like" button or Twitter "Tweet" button). The use of such integrated tools enables you to share personal data about yourself with other

individuals or the public, depending on the settings that you have established with such social networking site. By making personal data available on the Platform, you “opt in” to allow PING to provide such personal data to a social networking site without your further consent. For more information about the purpose and scope of data collection and use in connection with such social networking site or a site’s integrated tools, please visit the privacy policies of the entities that provide these social networking sites.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International data transfers

Ping Europe Limited shares some of its business processes and technical systems across borders with other Ping Companies and some of our IT systems are hosted and operated from the United States (**US**). This will involve transferring your data outside the European Economic Area (**EEA**). We ensure your personal data is protected by requiring all our PING companies to follow the same rules when processing your personal data.

Your personal data may also be processed by personnel working outside of the EEA who work for us or for one of our providers. Such personnel may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of content, products or services. By submitting your personal data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that personal data is treated securely and in accordance with this privacy policy and applicable law.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use third party service providers based outside the EU, we will use appropriate contractual provisions which give personal data the same protection it has in the EU.

7. **Data security, integrity and purpose limitation.**

We have 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.

- **Security.** PING employs reasonable and appropriate physical, administrative, and technical safeguards to protect personal data from becoming disclosed to individuals who are not described in this privacy policy. While there is no such thing as “perfect security” on the Internet, we will take reasonable steps to ensure the safety of your personal data.
- **Data integrity and purpose limitation.** PING limits the use of personal data to ways that are compatible and relevant to the purposes for which the personal data was collected or subsequently authorised or for which consent was obtained. PING will take reasonable steps to ensure that personal data is reliable for its intended use, accurate, complete, and current.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

8. **Data retention**

How long will you use my personal data for?

PING will retain your personal data as needed to fulfil the purposes for which it was collected, or until you withdraw your consent. PING will retain and use your personal

data as necessary to comply with PING's business requirements, legal obligations, resolve disputes, protect our assets, and enforce our agreements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

You also have the following rights under applicable data protection law in relation to your personal data:

- **request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- **request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
- **request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- **object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- **request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal

claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;

- **request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- **withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

PING has implemented the following procedure that you may use to access, correct or delete your personal data, or choose how your information is used:

- If you would like to know whether PING has collected personal data about you please send us the activities and services that you participated in on the Platform that requested personal data. After reviewing the relevant databases, PING will confirm whether PING has collected such information about you and provide a list of your personal data that we have on file.
- If your personal data is incorrect, you may correct the personal data by sending a written request for correction to PING Compliance to the address details in section 10. Your request must include: (a) all of the incorrect personal data that you wish to change, (b) the corrected personal data, and (c) your signature authorising such changes. PING will then correct the personal data in our database and send a written confirmation to you.
- If you wish to stop receiving email marketing communications from PING, please contact us at the address listed below or use the unsubscribe link at the bottom of any email marketing communication. If you opt out, we may still send you non-promotional communications, such as those to facilitate orders you have made.
- Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time PING does not modify your experience based upon whether such a signal is broadcast.
- If you wish to exercise any of the other rights set out above, please contact us at the address listed below or email us at info@pingeurope.co.uk

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly

unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We will try to respond to all legitimate requests within 30 days. Occasionally it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Communications

If you have any additional questions or concerns about our privacy policy or any other privacy or security issue, please contact us at:

Ping Europe Limited
Corringham Road
Gainsborough
Lincolnshire
United Kingdom
DN21 1XZ

Email: Info@pingeurope.co.uk

If PING needs, or is required, to contact you concerning any event that involves information about you, we may do so by email, telephone, or mail.

Revision 1 effective 6th November 2018.