

Privacy Policy

ZURU PRIVACY POLICY

Last updated: February 2017

ZURU is committed to safeguarding your privacy online. It is very important to us that you should be able to use and enjoy our websites without having to worry about your privacy.

This policy is designed to help understand how your personal information will be treated.

This policy may change from time to time, so please check back regularly.

Privacy Policy

This Privacy Policy ("Privacy Policy") describes the personal information that may be collected by us, what we use your personal information for, when we might disclose your personal information, the choices you can make about your personal information and how we handle your information.

This Privacy Policy applies to all ZURU websites (however accessed and/or used), whether via personal computers, mobile devices, or other technology ("Device") and other interactive features, applications or downloads that are operated by us that are available through these websites and contain this Privacy Policy (collectively "Website") produced and maintained by ZURU. By using the Website, you acknowledge that you've read and understood this Privacy Policy. ZURU includes any and all of their subsidiaries and affiliated companies and are referred to in this policy as "we", "our" or "us".

Collection of Personal Information

Personal information is information about an identifiable individual, or an individual who is reasonably identifiable whether the information is true or not.

Customers

We collect information that is directly related to the products and services you choose. The kind of personal information we collect can include: basic contact details (name, postal address, telephone number, or e-mail), demographic details such as age and/or gender, and products you are interested in.

Generally, we will collect personal information directly from you, and only to the extent necessary to provide the product or service you requested or to carry out

our internal administrative operations. We may collect personal information from you when you:

- fill in an application form;
- deal with us over the telephone or through any Device;
- purchase a product;
- e-mail us;
- submit your personal details through the Website;
- ask us to contact you after visiting the Website; or
- agree to complete an on-line survey.

We may also collect solicited personal information indirectly, through some publicly available sources, or through social media sites, like Facebook, Twitter, Google and others, who disclose to their users that the users' personal information is provided to businesses like ZURU. We will collect personal information from you by lawful and fair means and not in an unreasonable way.

Using Personal Information

We will collect, hold, use and disclose personal information for the purposes of providing or offering goods and services to you, for any purposes that you may reasonably expect, for any other purpose authorized by law, or for any other purposes with your consent (whether express or implied). This may include disclosures to organizations that provide us with technical and support services, and professional advice.

We use personal information in the following ways to:

- provide you with news and information about our products and services;
- provide, deliver, source, administer, and improve our products and services;
- provide marketing offers through direct marketing, database compilation, market research, data analysis and segmentation, and the processing or creation of other marketing information;
- communicate with you such as responding to queries and complaints;
- send you marketing and promotional material that we believe you may be interested in; or
- seek your feedback for market research purposes. Participation in feedback such as online surveys is completely voluntary and anonymous. It will not be used to gather identifying information about any individual

You may at any time request that we discontinue sending you emails or other communications.

Your personal information may also be used and disclosed to protect our rights or property and that of our users and, where appropriate, to comply with legal processes, which may include disclosures to law enforcement, regulatory or government agencies.

Direct marketing

From time to time we may use the personal information we collect from you to identify particular products and services which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. Every directly addressed marketing contact sent or made by ZURU will include a means by which you may unsubscribe (or opt out) of receiving further marketing information.

Further, you may instruct us at any time to remove any previous consent you provided to receive marketing communications from us. Requests should be directed to Customer Service - see Contact Us.

Entrants in Competitions, Contests and Sweepstakes

We may offer competitions, sweepstakes and contests through the Website that may require registration. By participating in a competition, contest or sweepstake, you agree to the terms, conditions and/or official rules that govern that particular promotion. If you choose to enter a competition, sweepstake or contest, we may disclose personal information to third parties or the public in connection with the administration of such competition, contest or sweepstake, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the official rules, such as on a winners' list.

Job Candidates

We collect information from job candidates. This information will contain personal information such as name, address, employment history and referee details. Generally, we will collect personal information directly from the job candidate but some information may be provided by third parties providing human resource services. Job candidate personal information will be used for recruitment purposes and to evaluate the job candidate's application. Where we wish to use the information for other purposes we will seek your agreement beforehand.

Disclosure

We do not disclose personal information to third parties unless we are permitted to do so by law or you have given us your consent to do so.

Accessing and checking the personal information we hold about you

You have the right to request access to the personal information we hold about you. This right is subject to certain exceptions (see below) allowed by law. The file containing your personal information will be kept on our servers and those of our service providers

Exceptions

Your right to access your personal information is not absolute. In some circumstances, the law permits us to refuse your request to provide you with access to your personal information. Such circumstances may include where:

- access would pose a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of others;
- the request is frivolous;
- the information relates to a commercially-sensitive decision-making process;
- access would be unlawful;
- access may prejudice enforcement activities, a security function or commercial negotiations.

Security

ZURU is committed to keeping your trust by protecting and securing your personal information. We have in place reasonable commercial standards of technology and operational security to protect all personal information provided to us from misuse, interference, loss, unauthorized access, modification or disclosure.

We limit access to personal information to individuals with a business need consistent with the reason the information was provided. We keep personal information only for as long as it is required for business purposes or by the law.

Information collected automatically

We may collect information automatically such as browser type, operating system, and web pages visited to help us manage our Website.

We use cookies (see below) and other internet technologies to manage the Website and certain online products and services. Our internet server logs the following information which is provided by your browser for statistical purposes only:

- the type of browser and operating system you are using;
- your Internet Service Provider and top level domain name (for example - .com, .gov, .au, .uk etc);

- the address of any referring website (for example - the previous website you visited); and
- your computer's IP (Internet Protocol) address (a number which is unique to the machine through which you are connected to the internet).

This information is used by ZURU for aggregated statistical analyses or systems administration purposes only. No attempt will be made to identify users or their browsing activities, except where required by law.

Cookies

When you interact with us on the internet, our system automatically sends you a 'cookie'. A cookie is a small amount of information sent from a web server to your computer, electronic tablet or smart phone that enables your device to be recognized. It is used to handle your internet sessions on that device and contains a unique identifier.

Other information stored by the cookie includes website traffic data. This data is not used to identify individual details. We only collate the data into anonymous results in order to evaluate and improve our internet user ability and services. You may disable cookies using your browser's preferences, but some features of the Website may not function if you do so.

Contact Us

To contact us with a query, complaint or a privacy question, visit: <http://www.zuru.com/zuru-feedback/>. A member of our Customer Service team will respond to you within a reasonable time frame.

Changes to This Policy

We will post changes to the Privacy Policy and publish the effective date when this policy is updated.

Safety on the Internet

Please remember that whenever you voluntarily give personal information publicly online - for example on message boards, through e-mail, or in chat areas - that information can be collected and used by others. If you provide personal information on forums like that - you do so at your own risk.

Your California Privacy Rights

California Civil Code Section 1798.83 permits customers of ZURU who are California residents to request certain information regarding its disclosure of their personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to info@zuru.com. These services will respect your browser's Do Not Track signals (or other well-established, commercially available mechanisms that provide you with the ability to exercise choice regarding the collection of Personal Information). If we receive a Do Not

Track notice, we will stop using any Personal Information for online behavioral advertising purposes.

For Canadian residents

We may send you marketing communications by e-mail, text message or other electronic means unless you did not opt-in when required or have opted-out from receiving further messages. You may at any time opt out of the use of your personal information for marketing purposes by contacting our Customer Service – see Contact Us above.