

SQUAD TOUR PTY LTD PRIVACY POLICY

SQUAD TOUR PTY LTD is committed to respecting and protecting your privacy. Our goal is to be clear about what information we collect and how we use and protect your personal information.

The below Privacy Policy (together with our Terms and Conditions) outlines how we may collect, use, store and process your personal information.

We truly hope that you will take time to read it through as we have no other goal but to maintaining your privacy. Please remember that you can manage your information and protect your privacy anytime by, for instance, viewing and editing your information in your account or controlling what kind of cookies are used when you visit our website.

SUMMARY

This privacy policy explains the types of personal data we collect and how we use and protect that information:

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1. SCOPE

This privacy policy applies to all personal data that is collected and used by us when you create a SQUAD account, when you visit or use the websites, applications, web shops, online, mobile, instore or other services of SQUAD (“Services”), when you purchase our products us, participate in events or contests of SQUAD or interact with us through social media or otherwise. For purposes of this privacy policy, ‘personal data’ means any information through which we can identify you, as further described below under ‘Personal Data We Collect’.

2. WHO WE ARE

“SQUAD” (referred to as “we”, “us”, “our”) in this policy primarily refers to Squad Tour Pty Ltd, the main operating company of SQUAD, and, where appropriate, to other companies in the Ashy Bines Group of Companies (listed on our website www.ashybines.com) or other entities over which SQUAD exercises management control. SQUAD is the “data controller”

of all personal data that is collected and used about SQUAD customers for the purposes of privacy and data protection laws, principles and regulations which may apply in your country.

3. PERSONAL DATA WE COLLECT

We may collect personal data from you (either directly or indirectly, through our third party partners or providers) in a number of ways.

The information we collect about you when you buy our products or use our Services may include the following (jointly referred to as: ‘personal data’).

General:

- a. **Your contact details.** Including your name, postal address and other contact details, such as your telephone number and e-mail address.
- b. **Your account data and electronic identification data:** Your SQUAD account and other electronic identification data (such as IDFA, GAID, IP address, MAC address) and the data you add to your SQUAD account such as your password, your date of birth, your gender, your language of preference, social media handles, the time zone you live in, your picture and other information you may share with us.
- c. **Information regarding your use of our online Services.** This may include data regarding the pages you visit, the products and services you like and the content of your abandoned shopping cart.
- d. **Your online purchases.** The data we collect if you purchase a product or use a Service online, such as the amount and date of purchase, the products or services, location of the store, the website or app through which you make your purchase, payment method, payment status, discount, delivery method and delivery address.
- e. **Your leisure activities, interest and events.** This includes information regarding events we organise or sponsor, including your interest in and registration to those events (including the date and place of the event).
- f. **Your training, nutrition and medical data.** The training, nutrition and medical history data that you fill out on or generate through the use of our Services or imported from other apps or services from our partners or third parties which includes your goals, performance, training schedule, meal plan or preferences, medical history, medical conditions or medical requirements, and other fitness and health related activities.
- g. **Activity data when using the Services.** Your clothing and shoe size and other personal measurement information and activity data that you voluntarily share with us through the use of the Services, such as weight, height, heartrate, calories burned, steps taken, nutritional information, sleep activities, other activity data and injuries.
- h. **Contest details.** The data we collect if you participate in a contest.
- i. **Your reviews.** The opinions, experiences, feedback, preferences and interests, and product or event reviews that you publish on our websites or share with us online or through social media, email etc.
- j. **Your Location.** Your location including real time geographic location of your computer or device through GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell- tower locations, but only if you use location- based features and turn on the location services settings on your device.

Please note that “Sensitive” personal data meaning personal details about your physical or mental health will only be processed if you have given your explicit consent, or it is necessary, or you have made it public.

You may refuse or revoke your consent at any time.

4. WHAT WE DO WITH YOUR PERSONAL DATA

SQUAD collects and uses your personal data for the purposes set out below. Please be informed that insofar SQUAD already holds information about you, SQUAD may use that information for the same purposes.

For the performance of our agreement with you:

In order to manage and handle your purchases and to provide you with the Services you requested from us, we use this information you give us to perform the services for which you have signed up.

To comply with a legal obligation to which SQUAD is subject to.

Any personal data referred to above may be used to maintain appropriate business records, to comply with lawful requests by public authorities and to comply with applicable laws and regulations or as otherwise required by law.

For our legitimate commercial interests:

We will use your contact details to send you newsletters or general marketing materials as well as surveys about products and Services you have purchased. At any time, you may opt out of receiving such marketing materials by following the instructions in any communication you receive from us. You can also control these preferences in your profile settings and device.

We will use the personal data referred to above to improve our products and Services as well as to understand our customers both on an aggregated and on an individual basis. In order to do so, we may combine the data we have obtained about you from the different Ashy Bines Group of Companies and SQUAD entities that have collected your personal data (if applicable). This also means that we analyse your use of our products and Services and we use this information to improve our products and Services and to give you a better user experience (e.g., we analyse what web pages you visit, which products and Services you use and like, how you use these products and Services, which enables us to create personal profiles and to assess what may be interesting to you, which recommendations we can give you when you purchase our products or use our Services (such based for example on your previous purchases and use of our Services)). Creating such personal profiles of our customers, also enables us to send you marketing materials that directly relate to your use of our products and Services, if you have chosen to receive such materials.

The personal data may also be used by Ashy Bines Group and SQUAD:

- a. to generate aggregated statistics about the users of our products and Services;
- b. to assist in security and fraud prevention;
- c. for system integrity purposes (preventing hacking, cheats, spamming, etc.);
- d. to remind you of your abandoned cart or send you an order confirmation;
- e. to facilitate our business operations, to operate company policies and procedures;

- f. to enable us to merge, sell, acquire, or transfer assets; and
- g. for other legitimate business purposes permitted by applicable law.

Use of information based on your consent:

Sensitive personal details such as your physical or mental health will only be processed if you have given your explicit consent, or it is necessary or you have deliberately made it public.

5. HOW WE SHARE YOUR DATA

We may share your personal data with the following parties:

- a. **Data controllers within the Ashy Bines Group of Companies and SQUAD.** Your personal data will be shared between the responsible Ashy Bines Group of companies that may use your personal data as described in this Privacy Policy. Such companies can be found on the website www.ashybines.com.
- b. **Service Providers and Processor.** We engage third party companies, contractors, vendors, agents, service providers, and affiliated entities to provide services to us on our behalf, such as support for the internal operations of our websites, online stores (including payment processors and third parties we use of sending your orders to your home address), Services (e.g., technical support processing), as well as related offline product support services, data storage and other services.

In providing their services, they can access, receive, maintain or otherwise process personal data on our behalf. Our contracts with these service providers do not permit use of your information for their own (marketing) purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your personal data and only process it in accordance with our instructions.

- c. **Partners.** Sometimes SQUAD offers you a service or application in co-operation with partners. We may also disclose your personal data to those partners, but only where you have consented or requested that we do so. If you win a contest or sweepstake, we may disclose the names of winners online. We may also share your information with third party partners and co-sponsors, where relevant; in such cases, we will clearly notify you of the sharing, and you will have the choice not to participate or to otherwise object to such sharing.
- d. **Third parties in case of legal requirement.** We may also disclose your personal data if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes; when we believe necessary or appropriate to disclose personal data to law enforcement authorities, such as to investigate actual or suspected fraud or violations of law, breaches of security, or breaches of this Privacy Policy; to respond to any claims against us; and, to protect the rights, property, or personal safety of SQUAD, our customers, or the public.
- e. **Corporate Transaction.** In addition, information about our customers, including personal data, may be disclosed as part of any merger, sale, transfer of SQUAD' assets, acquisition, bankruptcy, or similar event.

- f. **With Consent.** We may also disclose information about you, including personal data to any other third parties, where you have consented or requested that we do so.
- g. **Social Media:** You may be able to access third party social media services through our website or app or before coming to our website or app. When you are registered with your social media account, we will obtain the personal data you choose to share with us through these social media services pursuant to their privacy settings in order to improve and personalise your use of our website or app. We may also use social media plugins on our website or app. As a result, your information will be shared with your social media provider and possibly presented on your social media profile to be shared with others in your network. Please review the privacy policy of those third party social media service providers.

Notwithstanding anything else in this Privacy Policy, we may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual.

6. COOKIES, ANALYTICS AND PERSONALISATION

We may collect data from other sources which may not always be obvious, such as through the use of “cookies”. We may also gather information from both online and offline data providers. This information could include internet browsing behaviour, demographic data or interest-based data.

A cookie is a small text file stored on your computer that contains information that helps the website to identify and track the visitor. Cookies do no harm to your computer, consist only of text, cannot contain viruses, and occupy virtually no space on your hard drive.

Two types of cookies are used:

- a. Session Cookies;
- b. Permanent cookies.

Session Cookies: A "Session Cookie" is never stored permanently on your computer and disappears when you close your browser. Some parts of our websites will require you to have cookies enabled.

Permanent Cookie: The second type saves a file permanently to your computer. This type of cookie is used to track how visitors move around on the website. This is only used to offer visitors better services and support and can be deleted. On this website, we use this type of cookie to keep track of your shopping cart and to keep statistics of our visitors. The information stored on your computer is only a unique number, without any connection to personal information.

Here is a list of cookies that we currently use which you may opt out from:

Squad: TheLifeCookie

Session Cookie for authentication (to keep user logged in)

To opt out of cookies, you can alter the settings on your internet browser to accept or reject a website from using cookies. Please be aware that this may affect functionality of the website.

When you browse our website, we automatically receive your computer's internet protocol (IP) address in order to provide us with information that helps us learn about your browser and operating system.

As part of providing this service this website uses third party services like AppsFlyer, Google FireBase and Google Tag Manager. We may share your email address with these providers as and when required for statistical, technical, or other quantitative analysis purposes.

We may also collect data: regarding device IDs or identifiers, connection information, device software, statistics of page views, ad data, referral URLs and IP data; to determine your general geographic location, so that we can provide location-specific content to you; to assist in responding to complaints and queries; to investigate any possible breach of our terms or conditions including fraud or illegal activities with the use of your personal data; and with your permission, we may send you emails about our store, new products, and other updates. If we do ask for your personal information for a secondary purpose such as marketing and you are an individual in the European Economic Area (EEA), we will either ask you directly for your express consent, or provide you with an opportunity to say no. If after you opt-in, you change your mind, you may withdraw your consent at any time, by contacting us or by using the unsubscribe link within any of our emails. Same goes for anyone outside of the EEA.

We use tracking software to monitor customer traffic patterns and site usage to help us develop the design and layout of websites. This software does not enable us to capture any of your data.

Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

7. IF YOU ARE UNDER 16 YEARS OF AGE

Our online Services are not directed to children under 13 years of age. If you believe we have collected information about a child under the age of 13, please contact us at the contact address listed at the bottom of this Policy so that we may take appropriate steps to delete such information.

If you are at least 13 but under 16 years of age, please get the consent of your parent or legal guardian before you give us any personal data about yourself. Your parent or guardian should contact the Ashy Bines Group company responsible for using your personal and provide us with their name, e-mail address and any other identifying information that we may request. SQUAD needs this information in order to verify that they have provided the necessary consent.

8. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

Please be informed that we transfer and process any personal data you provide to us to countries other than your country of residence. The laws of these countries may not afford the same level of protection to your personal data. We will therefore seek to ensure that all adequate safeguards are in place and that all applicable laws and regulations are complied with in connection with such transfer.

9. SECURITY

SQUAD will take reasonable steps to ensure that your personal data are properly secured using appropriate technical, physical, and organisational measures, so that they are protected against unauthorised or unlawful use, alteration, unauthorised access or disclosure, accidental or wrongful destruction, and loss. Your personal data will be retained for as long as required for the above purposes or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage. The data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

10. DATA RETENTION

SQUAD retains your personal data for as long as required to satisfy the purpose for which they were collected and used (for example, for the time necessary for us to send you the newsletters you subscribed to, to provide you with customer service, answer queries or resolve technical problems, etc.), unless a longer period is necessary for our legal obligations or to defend a legal claim.

We can delete any personal data and account upon your request or 30 days after it has become inactive. We will consider your account 'inactive' when you haven't used your account for a period of 2 years. If we need to store certain types of your personal data for a longer period due to legal requirements, we will store such data in accordance with the mandatory periods.

11. YOUR RIGHTS

- a. You have the following rights concerning your personal data:
- b. right of access;
- c. right of rectification;
- d. right to erasure;
- e. right to restrict data processing;
- f. right to object against profiling and your right to data portability.

If you would like to contact us regarding any of these rights please email us at the address described below.

To the extent that we are relying on our legitimate interests to use your personal data, you also have the right to object to such use (unless we can have legitimate grounds for the use that override your interests, rights and freedoms or where we need to process that data for the establishment, exercise or defence of legal claims).

We will respond to your request within at least one month, to invoke your rights consistent with applicable law.

You may revoke your consent for receiving marketing communications at any time, free of charge by following the instructions in any marketing communication. You can also control these preferences in your profile settings. SQUAD will then stop applying the research results to you at an individual level and will stop sending you marketing communications.

In case you wish to revoke your consent to SQUAD using your health data or location data, you can send an email to us at the details described below. You can also control these preferences in your profile settings and device.

In case you may have a question or complaint about how we process your personal data, please email contact email listed below.

12. INTERNATIONAL DATA TRANSFER

SQUAD operates businesses in multiple jurisdictions, some of which are not located in the European Union or European Economic Area (EEA). While countries outside the EEA do not always have strong data protection laws, we require all services providers to process your information in a secure manner and in accordance with EU and other applicable laws on privacy and data protection.

13. OTHER WEBSITES

Our websites and mobile applications contain links to third-party websites; if you follow these links, you will exit our websites and mobile applications. While these third-party websites are selected with care, SQUAD cannot accept liability for the use of your personal data by these organisations. For more information, please review the privacy policy of the website you are visiting.

14. CHANGES TO PRIVACY POLICY

Our privacy policy may change from time to time. Any changes will be communicated to you by way of an e-mail or a notice on our website.

15. CONTACT AND QUERIES

If you have any questions regarding the processing of your personal data or this privacy policy, please contact us at customercare@ashybines.com: