

BELRON INTERNATIONAL LIMITED

SPIRIT OF BELRON ROUND THE WORLD CHALLENGE VIRTUAL EVENT (SOBC) – PRIVACY NOTICE

1 THIS NOTICE

- 1.1 This notice is provided by Belron International Limited (Company Number 02442568), whose registered office is at Milton Park, Stroude Road, Egham, Surrey, TW20 9EL (**Belron, we, us** or **our**) and is addressed to anyone who registers to take part in SOBC via the platform provided by our third party processor, Atlas Unlimited Inc. (“AtlasGO”), (together, **you**). It applies before, during and after SOBC in each year.
- 1.2 This notice relates to personal information about you from which you can be identified. We refer to this information throughout this notice as **personal data**. Personal data does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection. Section 2 of this notice sets out examples of your personal data that we use.
- 1.3 We are the controller of your personal data. This means that we are responsible for deciding how we hold and use personal data about you. As a controller we use (or ‘process’) the personal data we hold on you in accordance with this notice.
- 1.4 We take our data protection responsibilities seriously and this notice reflects the obligations set out in the General Data Protection Regulation (EU Regulation 2016/679) (**GDPR**) and any laws in England giving effect to its provisions.
- 1.5 This notice sets out how we collect and process your personal data. This notice also provides certain information that is legally required and lists your rights in relation to your personal data.
- 1.6 If you need to contact us in connection with our processing of your personal data, then you can do so at sobc@belron.com.
- 1.7 Your personal data belongs to you and it is your choice whether you provide us with your personal data. However, because we require certain items of your personal data in order for you to take part in SOBC, please be aware that if you do not provide all of the personal data requested from you by AtlasGo in relation to SOBC, then you may not be able to take part in some or all of SOBC. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes, whether prior to, during or after SOBC.
- 1.8 Please read this notice carefully, so that you are aware of how and why we are using your data.
- 1.9 This notice may be amended or updated from time to time. Please regularly check this page to review any changes made.

2 PERSONAL DATA

- 2.1 We may obtain personal data about you including but not limited to the following:
- 2.1.1 Personal details: given name(s), preferred name;
 - 2.1.2 Contact details: work or personal email address;
 - 2.1.3 Your status: e.g. Belron employee/family or friend of Belron employee/business partner or supplier/shareholder/invited by Afrika Tikkun;
 - 2.1.4 Your location;

- 2.1.5 images or video footage relating to SOBC taken by you and uploaded by you to the AtlasGO platform or otherwise submitted to us;
- 2.1.6 details of the activities that you have participated in and tracked on the AtlasGO platform such as nature of activity, dates the activity was undertaken and distance completed during the activity; and
- 2.1.7 entry fees paid and donations made to our chosen charity, Afrika Tikkun.

3 SOURCES OF PERSONAL DATA

We may obtain your personal data from various sources including the following (where relevant):

- 3.1 yourself;
- 3.2 other Belron group companies and affiliates;
- 3.3 your employer (if you are not employed by or do not work for a Belron group company or affiliate);
- 3.4 third party processors who we have engaged to assist us in carrying out the functions described in section 4.1; and
- 3.5 third party controllers of your personal data (including without limitation, third party fundraising platforms and Garmin, Strava and FitBit), who have collected, processed and transferred your personal data in accordance with the terms of their respective privacy policies.

4 LEGAL BASIS FOR PROCESSING

- 4.1 To process your personal data in connection with the purposes set out in section 5 of this notice, we will rely most commonly on one or more of the following legal bases:
 - 4.1.1 the processing is required for compliance with a legal obligation;
 - 4.1.2 we have a legitimate interest in carrying out the processing, which is not overridden by your interests, fundamental rights, or freedoms. When we rely on this legal basis our legitimate interests include the following:
 - (a) to enable us to administer the SOBC registration process;
 - (b) to enable us to set up and run SOBC;
 - (c) to enable us to publicise SOBC, both internally within the Belron group and externally in the market more generally;
 - (d) meeting external and internal governance obligations;
 - (e) to enable the business to share information intra group; and
 - (f) protection and security of property and rights.
- 4.2 In rare circumstances we may rely on the following legal bases:
 - 4.2.1 the processing is necessary to protect your vital interests or the interests of someone else; or
 - 4.2.2 the processing is necessary for the performance of a task carried out in the public interest.
- 4.3 We do not need your consent if we process your data under one or more of the other legal bases set out above. In limited circumstances we may approach you for your written consent to allow us to process certain data.
- 4.4 We may engage third party processors to assist us in carrying out the functions described in section 4.1 above. Such third parties may also collect personal data from you in the capacity of data controller. Please see the relevant privacy policy of each third party for more details.

5 PURPOSES OF PROCESSING

- 5.1 We need your personal data primarily to allow us to perform our contract with you, to enable us to comply with legal obligations and to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. We will use your personal data for a variety of different purposes including those listed below. Some of the legal bases for processing will overlap and there may be several which justify our use of your personal data.
- 5.2 We will use your personal data for a variety of different purposes including the following:
- 5.2.1 registering you to take part in or attend SOBC;
 - 5.2.2 setting up and running SOBC as an event;
 - 5.2.3 using images and video footage of SOBC (which may include images of you) for internal business purposes;
 - 5.2.4 marketing purposes including using images and video footage of SOBC (which may include images of you), your personal details, details of your work and/or the organisation for whom you work and on our website;
 - 5.2.5 dealing with legal disputes in relation to SOBC;
 - 5.2.6 protecting and defending our rights or property; and
 - 5.2.7 using your personal data in life or death situations (e.g. in the event of an accident and we have to give your personal details to medical personnel).

6 RECIPIENTS OF PERSONAL DATA

- 6.1 We choose our service providers carefully and require them to take appropriate security measures to protect your personal data. We may share or arrange for your personal data to be shared with the following recipients:
- 6.1.1 AtlasGO;
 - 6.1.2 Afrika Tikkun;
 - 6.1.3 Amazon Web Services, Inc.
 - 6.1.4 Cloudinary Ltd;
 - 6.1.5 OneSignal, Inc.
 - 6.1.6 Campaign Monitor Pty Ltd;
 - 6.1.7 Google LLC / Google BigQuery;
 - 6.1.8 Mode Analytics, Inc.
 - 6.1.9 Functional Software, Inc.
 - 6.1.10 AppsFlyer Ltd.
 - 6.1.11 giftT.
 - 6.1.12 any insurance companies that we use from time to time in connection with SOBC (if any);
 - 6.1.13 health professionals (e.g. in the event of an emergency);
 - 6.1.14 legal and regulatory authorities, on request, or for the purposes of reporting any actual or suspected breach of law or regulation;
 - 6.1.15 external professional advisers such as accountants, auditors, lawyers and other

- outside professional advisers, subject to binding obligations of confidentiality;
- 6.1.16 any relevant party, law enforcement agency, tribunal or court, to the extent necessary for the establishment, exercise or defence of legal rights; and
- 6.1.17 any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties.
- 6.2 In addition, we may disclose the personal data you provide to us to our group companies and affiliates or third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this notice.

7 TRANSFERS OF PERSONAL DATA OVERSEAS

- 7.1 We may transfer the personal data we collect about you to any location outside the EU in which any of our group companies operate in order to process your personal data in the manner set out in this notice in the countries where there is an adequacy decision by the European Commission. This means that these countries (to the extent we transfer your data to them) are deemed to provide an adequate level of protection for your personal data.
- 7.2 However, when we transfer and share your personal data across the Belron Group we ensure that your personal data does receive an adequate level of protection we have put in place a data sharing arrangement within the Belron group of countries, which we consider to be an appropriate measure to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection. You can request further information by contacting us as specified in section 1.6.
- 7.3 We may also transfer the personal data we collect about you any location outside the EU in which any of our third party processors operate. Where there is no adequacy decision by the European Commission in respect of such location, we have put in place standard contractual clauses, adopted by the European Commission for the transfer of personal data from data controllers in the EU to data processors in jurisdictions outside the European Economic Area (EEA) (Decision 2010/87/EU) ("Standard Contractual Clauses") with such processors and, when required, put in place all the additional safeguards necessary to ensure an adequate level of protection.

8 RETENTION OF PERSONAL DATA

- 8.1 We will hold your personal data only for so long as is necessary for us to do so. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.2 Where we no longer need to process your personal data for the purposes set out in this notice then we will delete your personal data from our system.

9 AUTOMATED DECISION MAKING

- 9.1 Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:
- 9.1.1 where we have notified you of the decision and given you 21 days to request a

reconsideration;

- 9.1.2 where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights; or
 - 9.1.3 in limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- 9.2 If we make an automated decision on the basis of any particularly sensitive personal data, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.
- 9.3 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.
- 9.4 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

10 YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

- 10.1 You have a number of rights in connection with the processing of your personal data, subject to certain conditions set out in the GDPR and in English law, including the right to:
- 10.1.1 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;
 - 10.1.2 request the correction of the personal data that we hold about you. This enables you to have incomplete or inaccurate data we hold about you corrected;
 - 10.1.3 request the 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;
 - 10.1.4 ask us to stop processing personal data where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
 - 10.1.5 request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it;
 - 10.1.6 request the transfer of your personal data to another party; and
 - 10.1.7 lodge a complaint regarding the processing of your data with the Information Commissioner’s Office.
- 10.2 In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (which will be made clear to you at the time), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us at sobc@belron.com in accordance with section 1.6. After we have received notification that you have withdrawn your consent in relation to a particular purpose we will no longer process your information for that purpose, unless we have another legitimate basis for doing so in law.
- 10.3 If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact sobc@belron.com in accordance with section 1.6.