



Asmodee Group  
**Global Data Privacy Policy**

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**GLOBAL DATA PRIVACY POLICY**

**ASMODEE GROUP**

This Global Data Privacy Policy ("Global Privacy Policy" or this "Policy") represents the minimum standards that Financière Amuse BidCo and its Affiliates, including **ASMODEE GROUP**, a French Société par actions simplifiée à associé unique having its registered office at 18 rue Jacqueline Auriol, Quartier Villaroy, 78280 Guyancourt, registered with the Commerce and Companies Register of Versailles under number 399 899 806, of which Space Cowboys is one of the studios ("Asmodee Group", "we", "our") have set with respect to data privacy, for ensuring that we collect, use, retain and disclose Personal Data in a fair, transparent and secure way.

It aligns with (and in some cases exceeds) the main requirements of applicable laws and regulations. This Policy is also aligned with other specific policies of Asmodee Group relating to the collection and use of information of Personal Data implemented by each entity of the Asmodee Group to cover the specific Personal Data Processing purposes needed for the day to day activity (e.g. cookies policy, specific local policies such as employees privacy policies). This Policy acknowledges that certain Asmodee Group Affiliates are located in countries with varying legal and cultural approaches to privacy and data protection. This Global Privacy Policy may thus be supplemented by other policies and procedures in certain geographic regions as may be appropriate to comply with applicable laws and meet local cultural norms.

In the event of a conflict between this Global Privacy Policy and the local applicable privacy policies and / or applicable local law as relevant, or inapplicability of the provisions of this Global Privacy Policy, the local applicable policy and local law should prevail.

Some useful definitions are provided in section 2 of this Global Privacy Policy for your ease of reference.

**1. What is the scope of this Global Privacy Policy?**

- 1.1 The Policy covers all Personal Data in any form, including but not limited to electronic data, paper documents and disks and all types of Processing, whether manual or automated that is under Asmodee Group's possession or control, in all geographies areas where Asmodee Group operates. This will include information held about Asmodee Group members, partners, employees, consultants, clients, consumers, suppliers, business contacts and any third parties.
- 1.2 We do care about minors protection and have implemented some reasonable measures to prevent the Processing of minors Personal Data. Therefore, we do not process Personal Data from children without checking their digital age which may vary from a country to another and obtaining their guardian's consent on their behalf if they do not have the minimum age required to provide their Personal Data to us.
- 1.3 This Policy also applies to any Third Parties who perform services for or on behalf of



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Asmodee Group and who are expected to embrace standards of conduct consistent with the principles of this Global Privacy Policy.

## 2. Definitions

- 2.1 **Asmodee Group** shall mean the company Financière Amuse BidCo (RCS Versailles 815 143 904) and the various Financière Amuse BidCo affiliates which are part of the Asmodee group.
- 2.2 **Affiliate** shall mean any corporation or other entity which directly or indirectly controls or is controlled by or is under common control with Financière Amuse BidCo. "Control" of an entity shall mean possession, directly or indirectly, of power to direct or cause the direction of management or policies of such entity, whether through ownership of voting securities, by contract or otherwise.
- 2.3 **Third Party** shall mean a third party or business Partner who receives from Asmodee Group or who is otherwise entrusted with Personal Data on behalf of Asmodee Group, for example suppliers, contractors, sub-contractors and other service providers.
- 2.4 **Data Subject** shall mean an identified or identifiable person whose Personal Data is being processed by Asmodee Group.
- 2.5 **Informed Consent** shall mean any freely given specific and informed indication of the Data Subject's agreement to the Processing of his/her Personal Data.
- 2.6 **Personal Data** shall mean any information capable of identifying a natural person, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity. Data is considered personal when it enables anyone to link information to a specific person, even if the person or entity holding that data cannot make that link.
- 2.7 **Sensitive Data (or Special Category of Data which include** data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) and **Personal Data relating to criminal convictions and offences** are a subset of Personal Data, which due to their nature have been classified by law or by an applicable policy as deserving additional privacy and security protections
- 2.8 **Process / Processing** shall mean any operation or set of operations that is performed upon Personal Data, whether or not by automatic means, including, but not limited to collection, recording, organization, storage, access, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, making available, alignment, combination, blocking, deleting, erasure, or destruction (and Process



shall be interpreted accordingly).

### **3. How do we ensure the lawfulness, fairness and transparency of our Personal Data Processing?**

#### **Personal Data is processed on the basis of legal grounds with the informed knowledge of the Data Subjects**

3.1 We will only use Personal Data:

- if necessary to perform a contract with the Data Subjects (e.g. our employees, contractors, clients, suppliers etc.); or
- if required to comply with a legal obligation; or
- where we have a legitimate business need or a legitimate business reason to use Personal Data as part of our business activities (e.g. when carrying out a Processing to better know our clients) ; or
- where we have the Data Subject's Informed Consent when it is specifically required. For instance where required by law (e.g. to send marketing information through electronic communication means) or by applicable policy, the Affiliate concerned of the Asmodee Group may need to obtain the consent of Data Subjects in order to collect, use, retain and disclose their Personal Data. This may also be the case where no other valid grounds described above is applicable and to the extent permitted under applicable law.

3.2 We consider that it is important to assess the privacy risks before we collect, use, retain or disclose Personal Data, such as in a new system or as part of a project.

3.3 Asmodee Group will only Process Personal Data in the way described in its specific privacy notices or privacy policies and in accordance with any Informed Consent we may have obtained from the Data Subject.

3.4 Asmodee Group will not carry out profiling activities based on automated decision making, unless legally grounded on a requirement of applicable law or the performance of a contract or the Data Subject's consent and provided that suitable safeguards are implemented to protect the Data Subjects rights.

3.5 We use cookie technology on our websites to allow us to evaluate and improve the functionality of our websites. We can also use cookies for advertising or analytics purposes, subject to your consent and depending on your choice by using our cookie control tools. For more information about how Asmodee Group uses cookies, please read its online Cookie Policy on each of its Internet websites.

3.6 Where legally required, we will ensure that Data Subjects are provided with relevant information, concerning the Processing of their Personal Data, unless there is an impossibility to provide such information or if it requires disproportionate efforts to provide such information. Such information will notably include, the purposes of the data Processing, the types of data collected (if the data have not been obtained directly from the data subject), the categories of recipients, the list of rights which



may be exercised by the Data Subjects, the consequences of a failure to reply, the conditions of the transfer of Personal Data outside EU, if any, and the mechanism used to protect the data in the event of a transfer, etc. This requirement may be satisfied by issuing a privacy notice to Data Subjects at the point where Personal Data are originally collected from them. Privacy notices shall be written in language which provides Data Subjects with a clear understanding as to how their Personal Data will be used.

**4. How do we process Personal Data for specific and legitimate purpose and verify that Personal Data is minimized and accurate?**

**Personal Data will only be collected and processed for legitimate purposes, complying with the Personal Data minimization principle and ensuring the accuracy of the Personal Data processed.**

- 4.1 Personal Data will be collected for specified, explicit and legitimate purposes (which could be multiple) and not further processed in a manner that is incompatible with those purposes.
- 4.2 We carefully evaluate and define the purposes of the Personal Data Processing before launching a project (e.g. management of HR data, management of recruitment data; payroll purpose, accounting and financial management, risk management, management of employees' safety, allocation of IT tools and any other digital solutions or collaborative platforms, IT support management, health and safety management, information security management, client relationship management, bids, sales and marketing management, supply management, internal and external communication and events management, compliance with anti-money laundering and anti-bribery obligations or any other legal requirements, data analytics operations, implementation of compliance processes , management of mergers and acquisition, etc.).
- 4.3 We will ensure that the Personal Data we collect are relevant, adequate and not excessive in relation to the purpose of the Data Processing and its eventual use (insights, marketing, promotions, etc.). This means that only necessary and relevant information for the purpose sought can be collected and processed.
- 4.4 When collecting Sensitive Data or Personal Data relating to criminal convictions and offences, proportionality is fundamental! We do not collect Sensitive Data or Personal Data relating to criminal convictions and offences, unless required by applicable law or when allowed by applicable law with the Data Subject's prior express consent.
- 4.5 Every reasonable step will be taken to ensure that Personal Data are maintained in an appropriately accurate and up-to-date form at every step of Personal Data Processing (i.e. collect, transfer, storage and retrieval).
- 4.6 We encourage the Data Subjects to help us maintaining your Personal Data up to date by exercising your rights notably of access and rectification.



## 5. What Security and confidentiality measures are implemented?

**Since** Employees, customers, suppliers, consumers and business partners put their trust in Asmodee Group when they provide us with their Personal Data, Asmodee Group **ensures the security and confidentiality of the Personal Data it Processes.**

- 5.1 We protect any Personal Data collected, used, retained and disclosed to support our business activities by following the relevant usage, technical and organizational policies, standards and processes.
- 5.2 Industry standard technical and organizational measures are implemented to prevent against accidental or unlawful destruction or loss, alteration, unauthorized disclosure or access, or any other unlawful or unauthorized forms of Processing.
- 5.3 Where Processing is to be carried out on behalf of Asmodee Group, it will select service providers providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that Processing will meet the requirements of applicable data protection laws and ensure the protection of the rights of the data subject.
- 5.4 Asmodee Group endeavors to take reasonable measures based on Privacy by design and Privacy by default (as defined hereafter) as appropriate to implement necessary safeguards when processing Personal Data Processing. Asmodee Group will thus implement technical and organisational measures, at the earliest stages of the design of the processing operations, in such a way that safeguards privacy and data protection principles right from the start ('Privacy by design'). By default, Asmodee Group should ensure that Personal Data is processed with privacy protection (for example only the data necessary should be processed, short storage period, limited accessibility) so that by default Personal Data is not made accessible to an indefinite number of persons ('Privacy by default').
- 5.5 When a Personal Data Processing is likely to result in a high risk to the rights and freedoms of Data Subjects, we will carry out a privacy impact assessment prior to its implementation.
- 5.6 No breach is too small for action. We will examine all claims related to any breach to this Global Privacy Policy or applicable data protection laws, potential or actual, that are brought to our attention or that we become aware of and will take all reasonable measures to limit their impact.

## 6. For how long do we keep your Personal Data?

- 6.1 Any person handling Personal Data for Asmodee Group will keep it only for as long as it is necessary for the purpose for which it has been collected and processed (and other compatible purposes) which may include:
  - to meet or support a business activity; or



- to comply with a legal or regulatory requirement and comply with applicable statute of limitation requirements;
- to defend against legal or contractual actions (in which case, the Personal Data may be retained until the end of the corresponding statute of limitation or in accordance with any applicable litigation hold policies).

6.2 Personal Data is retained and destroyed in a manner consistent with applicable law and in accordance with Asmodee Group applicable retention policy.

## 7. What are your rights, as Data Subject?

**We are receptive to queries or requests made by Data Subjects in connection with their Personal Data and where required by law, we provide Data Subjects with the ability to access, correct, restrict and erase their Personal Data as set forth by applicable law. We also allow them to oppose the Processing of their Personal Data, and to exercise their right to portability.**

- 7.1 **Access right:** we will provide access to all Personal Data related to a Data Subject as required by law, to the purposes of the Processing, categories of data processed, categories of recipients, data retention term, rights to rectify, delete or restrict the data accessed if applicable, etc.).
- 7.2 **Right to portability:** we may also provide a copy of any Personal Data that We hold in our records in a format compatible and structured to allow the exercise of right to data portability to the extent it is relevant under applicable law.
- 7.3 **Right to rectification:** Data Subjects can request to correct, amend, erase, any information which is incomplete, out of date or inaccurate.
- 7.4 **Right to erasure:** Data Subjects can request the deletion of their Personal Data (i) if such Personal Data is no longer necessary for the purpose of the data Processing, (ii) the Data Subject has withdrawn his/her consent on the data Processing based exclusively on such consent, (iii) the Data Subject objected to the data Processing, (iv) the Personal Data Processing is unlawful, (v) the Personal Data must be erased to comply with a legal obligation applicable to Asmodee Group. Asmodee Group will take reasonable steps to inform the other entities of the Asmodee Group of such erasure.
- 7.5 **Right to restriction:** (i) in the event the accuracy of the Personal Data is contested to allow Asmodee Group to check such accuracy, (ii) if the Data Subject wishes to restrict the Personal Data rather than deleting it despite the fact that the Processing is unlawful, (iii) if the Data Subject wishes Asmodee Group to keep the Personal Data because he/she needs it for his/her defense in the context of legal claims (iv) if the Data Subject has objected to the Processing but Asmodee Group conducts verification to check whether it has legitimate grounds for such Processing which may override the Data Subject's own rights.



- 7.6 **Right to withdraw his/her consent:** when the Personal Data Processing is based on Data Subject's consent, Data Subject may withdraw such consent at any moment, without affecting the lawfulness of Processing based on consent before its withdrawal.
- 7.7 **Right to object: Data Subject can also indicate his/her objection** to the Processing of his/her Personal Data at any time:
- when used for marketing purpose or profiling to send targeted advertising, or
  - to object to the sharing of his/her Personal Data with third parties or within the Asmodee Group, or
  - when the Processing is based on the legitimate interest of Asmodee Group, unless Asmodee Group demonstrates compelling legitimate grounds for the Processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defense of legal claims.

To exercise these rights, please complete this [form](#) and send it to us at the contact details provided.

Data Subject has also the right to lodge a complaint with the competent supervisory authority.

## 8. **When and how do we disclose your Personal Data to third parties?**

**Personal Data is only disclosed outside Asmodee Group where there is an overarching legal justification to do this.**

- 8.1 Disclosure is made on a strictly limited 'need to know' basis where there is clear justification for transferring Personal Data - either because the Data Subject has consented to the transfer or because disclosure is required to perform a contract to which the Data Subject is a party, or for a legitimate purpose that does not infringe the Data Subject's fundamental rights, including the right to privacy (e.g. sharing in the context of a merger and acquisition operation etc.). In each case the Data Subject will be aware that the disclosure is likely to take place. Assurances will also be sought from the recipient that they will only use the Personal Data for legitimate / authorized purposes and keep it secure.
- 8.2 If a particular disclosure is required to meet a legal obligation (for example to a government agency or police force / security service) or in connection with legal proceedings, generally the Personal Data may be provided so long as the disclosure is limited to that which is legally required and, if permitted by law, the Data Subject has been made aware of the situation (i.e. the Data Subject was told of the possibility of such an event in an Informed Consent or is notified at the time of the request for disclosure).



## 9. How are international transfers of Personal Data from EU protected?

**Personal Data originating from those Asmodee Group entities operating within the EU will not be transferred outside the EU to a third country which does not ensure an adequate level of protection unless appropriate safeguards are implemented in accordance with applicable laws.**

- 9.1 International Personal Data transfer is a very sensitive topic and taken seriously before transferring any Personal Data from its EEA (European Economic Area or "EEA") country of origin to another non EEA country, whether such transfer is done for technical purposes (storage, hosting, technical support, maintenance etc.) or the main purposes (Human Resources management, clients database management, etc.).
- 9.2 We never carry out international transfers of Personal Data from a EEA country to another non EEA country without ensuring that appropriate transfer mechanisms as required by applicable data protection laws are in place, to ensure adequate protection of the data when transferred (e.g. adequacy decision, signature of EU Commission model clauses as appropriate, etc.). In some cases, we may also have to notify or gain pre-approval from the relevant privacy regulator prior to the transfer taking place.

## 10. How do we handle complaints?

- 10.1 Asmodee Group is committed to resolving the legitimate privacy issues of its staff, clients and other contacts. If a member of staff feels that he/she has done something in breach of this Global Privacy Policy, they must contact the Legal Department of Asmodee Holding, Affiliate of Financière Amuse BidCo at the following address : [privacy-holding\[AT\]asmodee.com](mailto:privacy-holding[AT]asmodee.com) and report the matter.
- 10.2 Data Subjects are informed that they can complain about privacy issues by writing an email to the Legal Department of Asmodee Holding at the following address : [privacy-holding\[AT\]asmodee.com](mailto:privacy-holding[AT]asmodee.com), and that they may file a complaint with a supervisory authority. In particular, this shall be expressly specified in the privacy notices communicated to and/or accessible by Data Subjects.
- 10.3 If an individual covered by this Global Privacy Policy files a complaint about the Processing of his/her or someone else's Personal Data, and the complaint is not satisfactorily resolved through this internal procedure, Asmodee Group will cooperate with the appropriate data protection authorities and comply with the advice of such authorities to resolve any outstanding complaints. In the event that the Data Protection Officer or the data protection authorities determine that Asmodee Group or one or more of its staff failed to comply with this Global Privacy Policy or the data protection laws, upon recommendation of the authorities or the Data Protection Officer, Asmodee Group will take appropriate steps to address any





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adverse effects and to promote future compliance.

**11. Update of this Global Privacy Policy**

As our business and the regulatory environment change regularly, this Global Privacy Policy may also change. You are thus invited to consult it on a regular basis.

Last update: March 30<sup>th</sup>, 2021.

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