

Customer Information Notice (B2C)

Cojones Prod is committed to respecting your privacy. This information notice sets out how we process your personal data when you use the products or services provided by Cojones Prod.

This information notice sets out our approach to the processing of personal data that we collect from you or that third parties lawfully disclose to us and the purposes of such processing. It also describes your rights with regard to our processing of your personal data.

We may collect personal data from you in the course of our business, including your use of our applications and websites (the "Site" or the "Sites"), when you participate in game tests, contests, when you contact us or request information. We may also receive information about you from social networks when you use our accounts.

1. **Who is responsible for the processing of your personal data?**
2. **Minimum age**
3. **What personal data about you do we collect?**
4. **How do we use your personal data?**
5. **With whom do we share your personal data?**
6. **How long do we keep your personal data?**
7. **Security of your personal data**
8. **What are your rights?**
9. **Contact and complaints**
10. **Update of the Information Notice**

1. Who is responsible for the processing of your personal data?

Cojones Prod, a Belgian limited company whose registered office is located at 22 rue des Comédiens, Brussels, 1000, Belgium and registered with the Banque Carrefour des Entreprises under number 0693.778.741 (hereinafter "Cojones Prod" or "we"), is the data controller tasked with the processing of your personal data.

2. Minimum age

We are committed to preserving the safety and privacy of children. We do not voluntarily collect or use personal data from persons under the age of 13 without the consent of both the child and the person with parental responsibility. Also, you confirm that you are at least 13 years of age or older when you provide your personal data in connection with the use of our products or services. If you are

not at least 13 years old, you must ask your parent or legal guardian for permission to provide us with your personal data. To do this, please contact us at the contact information provided in section 9 below.

3. What personal data do we collect?

We collect information about you, including:

- Your identification data such as your first and last name, address(es), company, telephone number (landline or mobile), e-mail address, login, password and date of birth,
- Your personal characteristics such as your title and language,
- Your connection data (IP addresses, cookies) when you use our Sites; for more information, please see our [Cookie Policy](#)¹,
- Your personal behaviors, habits and activities (including your personal gaming habits and activities: login, cards played, scores, number of games played, etc.) when you use our Sites,
- Your additional data communicated when registering, placing an online order and the requests you make on this occasion, such as the items chosen, delivery and billing address. Data related to incidents that may occur during the use of the Sites and/or the communication channels that we offer,
- Any other information relating to the provision of our services and to respond to your requests.

The personal data that we have access to via social networks when you use our accounts are:

- Your identification data such as first and last name, ID, profile picture, date of birth,
- Your connection data (IP addresses, cookies),
- Your personal characteristics such as language and city,
- Your personal data designated as public on these networks as well as the data contained in the private messages you send us via these networks.

4. How do we use your personal data?

We process your personal data for the following purposes. Whenever we process your personal data, we do so on the basis of a legal "justification" (or legal basis) for the processing, which we have identified in the table below.

	Purposes	Legal basis
1.	To respond to your requests for certain products and services and to perform contracts to which you are a party.	This processing is necessary for the execution of the contract concluded between you and Cojones Prod or for the execution of pre-contractual measures taken at your request.
2.	To administer contests or other promotional events and notify winners.	This processing is necessary for the execution of the contract between you and Cojones Prod and / or one of its partners.
3.	To test games	This processing is based on your prior consent at the time of registration. You have the right to withdraw your consent at any time.
4.	To respond to your requests and complaints.	This processing is based on your prior consent.

¹ <https://cojones.be/rgpd/fr/COOKIES.pdf>

5.	To provide you with commercial information about our products and services.	We consider that it is in our legitimate interest to keep our customers informed of our products and services, as this helps us to ensure the sustainability and development of our business. However, when the law requires Cojones Prod to obtain your consent before sending you such information, Cojones Prod will rely on your prior consent in order to proceed with the processing.
6.	To comply with any applicable law, court order, legal process, or regulatory agency requirements.	This processing is necessary to comply with our legal obligations.
7.	To optimise the navigation on the Sites	We consider that it is in our legitimate interest to optimise our Sites.
8.	To improve our products and services	We consider that it is in our legitimate interest to improve our products and services.
9.	To enforce our legal rights and obligations and for any legal proceedings involving you, initiated by or against you.	We consider it to be in our legitimate interest to protect our organisation against any breach of a legal obligation owed to it and to defend ourselves in the event of a dispute.
10.	To protect the rights of third parties.	This processing is necessary to comply with the legal obligations to which Cojones Prod is subject. This processing is also necessary for the purposes of the legitimate interests pursued by Cojones Prod. We consider that we have a legitimate interest in ensuring that our activities do not violate the rights of third parties.
11.	In anticipation of and/or in connection with a business transaction such as a merger, acquisition, restructuring or sale.	We consider it to be in our legitimate interest to be able to make decisions regarding the future of our company in an informed manner, with the aim of preserving and developing our business activities.
12.	To ensure the security of your data	We consider it to be in our legitimate interest to ensure the security of your data.
13.	For statistics, especially marketing statistics	This processing is based on your prior consent.

5. With whom do we share your personal data?

We may share your personal data, as required by us, with the following categories of recipients:

- The other entities of the Asmodee Group to which Cojones Prod belongs (the list of entities belonging to the Asmodee Group is available [here](#)²),

² https://corporate.asmodee.com/smd-content/uploads/Templates/Asmodee_group_companies_EN.pdf

- Third-party service providers (maintenance, storage, payment, logistics, marketing services, etc.), which Cojones Prod uses for the purposes described in section 4 above,

Our main subcontractors are:

- For the hosting of information systems: ONE.COM GROUP AB, a company incorporated under the laws of Sweden, whose registered office is located at 215 32 Malmö (Sweden), Hyllie Stationstorg, 2, company No. 559205-2400,
 - For internal storage and instant messaging: MICROSOFT IRELAND OPERATIONS LIMITED, a company incorporated under the laws of Ireland, whose registered office is located at 70 Sir Rogerson's Quay, Dublin 2, Ireland, Trade Register No. 256796,
 - For promotional communications: the French simplified joint stock company MAILJET, whose registered office is located at 75012 Paris (France), 13/13bis rue de l'Aubrac, registered on the Paris Trade and Companies Register under number 524 536 992 ,
 - For the productivity, collaboration and organization tools of our teams: ASANA Inc., a company incorporated under the laws of America, whose registered office is located in San Francisco, CA 94103 (USA), Bryan Street, 1550, Suite 200,
 - For internal agenda management: SCHEDAPPLE LLC, a company incorporated under the laws of America, whose registered office is located at A307 Cheyenne Wyoming (USA), Capitol Avenue, 1603, Suite 310, company No. 2015-000684737,
 - For e-mail messaging: ONE.COM GROUP AB, a company incorporated under the laws of Sweden, whose registered office is located at 215 32 Malmö (Sweden), Hyllie Stationstorg, 2, company No. 559205-2400,
- Our professional advisors such as lawyers and accountants, auditors,
 - Shareholders,
 - Governmental or regulatory authorities,
 - Professional insurers or all other relevant types of insurers,
 - Regulatory authorities / tax authorities / company registries, and
 - Banks.

Please note that this list is not exhaustive and that there may be other cases where we share your data with third parties, when it is in the legitimate interest of Cojones Prod, permitted by applicable law, or when it is necessary to comply with a legal obligation to which we are subject or necessary for the execution of the contract between you and Cojones Prod.

In this context, your personal data may be transferred outside the European Economic Area (EEA), to countries that do not offer a level of protection for your personal data equivalent to that which you enjoy within the EEA, such as China, the United States, Canada, etc. In the absence of an adequacy decision by the European Commission, the transfer of your personal data will be governed by the standard contractual clauses adopted by the European Commission or the "Privacy Shield".

6. How long do we keep your personal data?

We retain your personal data for as long as necessary to achieve the purposes for which it was collected. As a general rule, we keep your personal data for the period of time strictly necessary for the management of the business relationship with you. However, we retain your personal data used for marketing purposes for an additional period of three years after the end of the business relationship.

In addition, we may retain some of your personal data for a longer period of time, in particular when we are required to do so by law or when such data is necessary to prove a right or contract. In this

case, your personal data will be archived and kept for the duration imposed by the applicable regulations, or for the duration of the applicable legal prescription.

When your personal data is no longer required, we will ensure that it is deleted or made anonymous.

7. Security of your personal data

We are committed to ensuring the security of your personal data and we have put in place information systems security policies and appropriate technical rules and measures to protect it against unauthorised access, modification, use and disclosure or unlawful destruction or accidental loss of such data.

All our partners, employees, consultants and data processors, who have access to personal data and are involved in its processing, are obliged to respect its confidentiality.

8. What are your rights?

You have a number of rights over your personal data. Each of these rights is described in more detail below:

- **Consent withdrawal.** You may revoke your consent to any processing of your personal data based on your consent at any time. The withdrawal of your consent does not affect the lawfulness of the processing based on your consent prior to such withdrawal.
- **Access.** You may ask us to confirm whether we are processing your personal data and, if so, to inform you of the characteristics of the processing of your personal data, allow you to access it and obtain a copy of it.
- **Rectification.** You may ask us to correct or complete your personal data if they are incorrect or incomplete.
- **Erasure.** You may ask us to delete your personal data in the following cases: when they are no longer necessary for the purposes for which they were collected; you have revoked your consent; following the exercise of your right to object; your personal data have been unlawfully processed; or to comply with a legal obligation. We are not obliged to comply with your request for the deletion of your personal data, in particular if their processing is necessary to comply with a legal obligation or to establish, exercise or defend legal rights.
- **Limitation.** You may ask us to limit the processing of your personal data (i.e. to keep it without using it) when: their accuracy is contested; their processing is unlawful but you do not want them deleted; they are still necessary to establish, exercise or defend legal rights; we verify the existence of compelling reasons in the context of the exercise of your right to object. We may continue to use your personal data following a request for restriction: with your consent; to establish, exercise or defend legal rights; or to protect the rights of any other natural or legal person.
- **Portability.** You may ask us to provide your personal data in a structured, commonly used, machine-readable format, or you may request that they be transmitted directly to another data controller, but only if the processing is based on your consent or on the performance of a contract concluded with you and the processing is automated.
- **Opposition to canvassing.** If you provide us with your telephone number but do not wish to be canvassed by telephone, you can register free of charge on the "Do not call me anymore!" list by following the link: <https://www.dncm.be/fr/>.
- **Opposition to the processing of personal data based on legitimate interest.** You may object to any processing of your personal data that is based on our "legitimate interest" (see section 4). If you exercise this right, we must stop the processing unless we demonstrate the existence

of legitimate and compelling reasons overriding your fundamental rights and freedoms, or to establish, exercise or defend legal rights.

- **Opposition to the processing of personal data for canvassing purposes.** You may at any time oppose the processing of your personal data for canvassing purposes.

To exercise your rights regarding your personal data, please send us this [form³](#), duly completed, to the following e-mail address: gdpr@cojones.be

You also have the right to lodge a complaint with the Data Protection Authority (APD). A form is available on the APD website: <https://www.autoriteprotectiondonnees.be>. The complaint should then be sent either by e-mail: contact@apd-gba.be, or by post to APD's address: Rue de la Presse 35, 1000 Brussels.

9. Contact and complaints

For more information concerning your rights or for any questions concerning the protection of your personal data, please contact Cojones Prod:

- by mail at the following address: Cojones Prod - Rue des Comédiens, 22 - 1000 Brussels
- by e-mail to the following address: gdpr@cojones.be

10. Update of the Information Notice

We may amend this Information Notice from time to time, for example, to take into account changes in the law, technological advances and good business practices. We will inform you in case of significant changes.

³ <https://cojones.be/rgpd/en/FORM.pdf>