

Privacy Policy

Our Privacy Policy was last updated and posted on May 18, 2018. It governs the privacy terms of our Website, located at footstock.com, sub-domains, and any associated web-based and mobile applications (collectively, "Website"), as owned and operated by Footstock / WR digital GmbH. Any capitalized terms not defined in our Privacy Policy, have the meaning as specified in our Terms of Service.

Your privacy is very important to us. Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate and disclose and make use of personal information. We use your Personal Information only for providing and improving the Site and for marketing purposes, using specific marketing emails. By using the Site, you agree to the collection and use of information in accordance with this policy. The following outlines our privacy policy.

- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use of personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law.
- We will only retain personal information as long as necessary for the fulfilment of those purposes.
- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.
- We will make readily available to customers information about our policies and practices relating to the management of personal information.

Definitions

Data Controller: WR digital GmbH (following as “The Owner”), with legal registered offices at Schulberg 31 50858 Köln Germany Amtsgericht Köln - HRB 90905.

Owner contact email: help@footstock.com

Jurisdiction and acting regulations: This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation). This privacy policy relates solely to this Website, if not stated otherwise within this document.

Legal basis of processing: The Owner may process Personal Data relating to Users if one of the following applies: Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law; provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof; processing is necessary for compliance with a legal obligation to which the Owner is subject; processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner; processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party. In any case, the Owner will

gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Privacy

Footstock follows all legal requirements to protect your privacy. Our Privacy Policy is a legal statement that explains how we may collect information from you, how we may share your information, and how you can limit our sharing of your information. We utilize the Personal Data you offer in a way that is consistent with this Personal privacy Policy. If you provide Personal Data for a particular reason, we could make use of the Personal Data in connection with the reason for which it was provided. For example, registration info sent when developing your account, might be used to assist suggest products to you based on past acquisitions. We might use your Personal Data to offer access to services on the Website and monitor your use of such services. Footstock may also utilize your Personal Data and various other personally non-identifiable info gathered through the Website to assist us improve the material and functionality of the Website, to much better comprehend our users, and to improve our services. You will see terms in our Privacy Policy that are capitalized. These terms have meanings as described in the Definitions section below.

Definitions

"Non Personal Information" is information that is not personally identifiable to you and that we automatically collect when you access our Website with a web browser. It may also include publicly available information that is shared between you and others.

"Personally Identifiable Information" is non-public information that is personally identifiable to you and obtained in order for us to provide you within our Website. Personally Identifiable Information may include information such as your name, email address, and other related information that you provide to us or that we obtain about you.

Information We Collect

Generally, you control the amount and type of information you provide to us when using our Website.

As a Visitor, you can browse our website to find out more about our Website. You are not required to provide us with any Personally Identifiable Information as a Visitor.

In any case, this is the list of collected information directly by us at the moment of registration:

- First name
- Second name
- Address
- Date of Birth
- Valid email address
- IP used
- Qualitative/Quantitative figures of pages visited into our domain.

Computer Information Collected

When you use our Website, we automatically collect certain computer information by the interaction of your mobile phone or web browser with our Website. Such information is typically considered Non Personal Information. We also collect the following:

- **Cookies**

Our Website uses "Cookies" to identify the areas of our Website that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to personalize the Content that you see on our Website. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our Website correctly or at all. We never place Personally Identifiable

Information in Cookies.

- **Automatic Information**

We automatically receive information from your web browser or mobile device. This information includes the name of the website from which you entered our Website, if any, as well as the name of the website to which you're headed when you leave our website. This information also includes the IP address of your computer/proxy server that you use to access the Internet, your Internet Website provider name, web browser type, type of mobile device, and computer operating system. We use all of this information to analyze trends among our Users to help improve our Website.

- **Log Data**

Like many Website operators, we collect information that your browser sends whenever you visit our Website ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages and other statistics.

Under the Child's Online Privacy Security Act, no Website operator can require, as a condition to involvement in an activity, that a child younger than 13 years of age divulge more details than is reasonably required. Footstock abides by this demand. Footstock just collects information willingly offered; no information is gathered passively. children under 13 can submit only their email address when sending us an email in our "Contact Us" area. Footstock makes use of the e-mail address to respond to a one-time demand from a child under 13 and afterwards deletes the e-mail address. In case Footstock collects and maintains personal information relating to a child under 13, the parent may send out an email to us to review, alter and/or erase such info as well as to decline to enable any additional collection or use of the child's information.

How We Use Your Information

We use the information we receive from you as follows:

- **Customizing Our Website**

We may use the Personally Identifiable information you provide to us along with any computer information we receive to customize our Website.

- **Sharing Information with Affiliates and Other Third Parties**

We do not sell, rent, or otherwise provide your Personally Identifiable Information to third parties. We may provide your Personally Identifiable Information to affiliates that provide services to us with regards to our Website (i.e. payment processors, Website hosting companies, etc.); such affiliates will only receive information necessary to provide the respective services and will be bound by confidentiality agreements limiting the use of such information.

- **Data Aggregation**

We retain the right to collect and use any Non Personal Information collected from your use of our Website and aggregate such data for internal analytics that improve our Website and Service as well as for use or resale to others. At no time is your Personally Identifiable Information included in such data aggregations.

- **Legally Required Releases of Information**

We may be legally required to disclose your Personally Identifiable Information, if such disclosure is (a) required by subpoena, law, or other legal process; (b) necessary to assist law enforcement officials or government enforcement agencies; (c) necessary to investigate violations of or otherwise enforce our Legal Terms; (d) necessary to protect us from legal action or claims from third parties including you and/or other Members; and/or (e) necessary to protect the legal rights, personal/real property, or personal safety of Footstock, our Users, employees, and affiliates.

Opt-Out

We offer you the chance to "opt-out" of having your personally identifiable information used for particular functions, when we ask you for this detail. When you register for the Site, if you do not want to receive any additional material or notifications from us, you can show your preference on our registration form.

Links to Other Websites

Our Website may contain links to other websites that are not under our direct control. These websites may have their own policies regarding privacy. We have no control of or responsibility for linked websites and provide these links solely for the convenience and information of our visitors. You access such linked Websites at your own risk. These websites are not subject to this Privacy Policy. You should check the privacy policies, if any, of those individual websites to see how the operators of those third-party websites will utilize your personal information. In addition, these websites may contain a link to Websites of our affiliates. The websites of our affiliates are not subject to this Privacy Policy, and you should check their individual privacy policies to see how the operators of such websites will utilize your personal information.

Google Analytics Use

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – Privacy Policy – Opt Out. Privacy Shield participant.

Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. We utilize practical protection measures to safeguard against the loss, abuse, and modification of the individual Data under our control. Personal Data is kept in a secured database and always sent out by means of an encrypted SSL method when supported by your web browser. No Web or e-mail transmission is ever totally protected or mistake cost-free. For example, email sent out to or from the Website may not be protected. You must take unique care in deciding what info you send to us by means of e-mail.

Privacy Policy Updates

We reserve the right to modify this Privacy Policy at any time. You should review this Privacy Policy frequently. If we make material changes to this policy, we may notify you on our Website, by a blog post, by email, or by any method we determine. The method we chose is at our sole discretion. We will also change the "Last Updated" date at the beginning of this Privacy Policy. Any changes we make to our Privacy Policy are effective as of this Last Updated date and replace any prior Privacy Policies.

Standard Rights of the User under GDPR

Users may exercise certain rights regarding their Data processed by the Owner.

Users entitled to broader protection standards may exercise any of the rights described below. In all other cases, Users may inquire with the Owner to find out which rights apply to them.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.

- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Data transfer outside EU

The Owner is allowed to transfer Personal Data collected within the EU to third countries (i.e. any country not part of the EU) only pursuant to a specific legal basis. Any such Data transfer is based on one of the legal bases described below. Users can inquire with the Owner to learn which legal basis applies to which specific service. Data transfer to countries that guarantee European standards (this Website) If this is the legal basis, the transfer of Personal Data from the EU to third countries is carried out according to an adequacy decision of the European Commission. The European Commission adopts adequacy decisions for specific countries whenever it considers that country to possess and provide Personal Data protection standards comparable to those set forth by EU data protection legislation. Users can find an updated list of all adequacy decisions issued on the European Commission's website. Personal Data collected: various types of Data. Data transfer abroad based on consent (this Website) If this is the legal basis, Personal Data of Users shall be transferred from the EU to third countries only if the User has explicitly consented to such transfer, after having been informed of the possible risks due to the absence of an adequacy decision and appropriate safeguards. In such cases, the Owner shall inform Users appropriately and collect their explicit consent via this Website.

Questions About Our Privacy Practices or This Privacy Policy

We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained. If you have any questions about our Privacy Practices or this Policy, please contact us.