

Hasbro UK Limited– Privacy Policy

11 November 2021

WELCOME!

This privacy policy ("**Privacy Policy**") explains how Hasbro UK Limited and its subsidiaries and affiliated companies (collectively, "**Hasbro**", "**we**", "**our**", or "**us**") collect, use and disclose your personal information when you enter the promotional website <https://monopolybyyou.virtual-tech.io/monopoly> hosted by our marketing agency Noonah Marketing Limited ("**Site**") for the purposes of creating your own one-off personalised packaged MONOPOLY CLASSIC GAME ("**Product/Services**")

We ask that you take the time to read this Privacy Policy carefully.

1. BACKGROUND

We respect the privacy of our customers and we are committed to keeping all your Personal Data secure.

We collect and use certain Personal Data and we are responsible for ensuring that we use that Personal Data in compliance with data protection laws, including the EU General Data Protection Regulation ("**GDPR**") and any other national, implementing or supplementing data protection legislation such as, in the UK, the Data Protection Act 2018.

We use the following definitions in this Privacy Policy:

User(s) or You	means the users of the Site and/or anyone whose Personal Data we collect and use in relation to the Products/Services being offered.
Personal Data	means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Hasbro (or its representatives or service providers).

2. CHANGES TO THIS PRIVACY POLICY

We encourage you to review this Privacy Policy whenever you access and/or use the Services to make sure that you understand our Personal Data collection, use and disclosure practices. We may make minor changes to the provisions of this Privacy Policy at any time and will indicate when changes have been made by revising the date at the top of this Privacy Policy. If we make material changes to this Privacy Policy, we will provide you with additional notice of such changes by sending you an email at the last email address that you provided us, or by prominently posting notice of the changes on the Site

3. WHAT INFORMATION IS COLLECTED FROM ME?

The Product/Services offered by Hasbro on the Site require us to obtain Personal Data about you in order to provide and/or perform the Services. Users may be unable to access the Site if such Personal Data are

not provided. In relation to the Services, we may collect and process the following Personal Data about you:

INFORMATION THAT YOU PROVIDE TO HASBRO

We collect Personal Data that you provide when you access and use the Services, such as when you:

- create an account on the Site or subscribe to the Services;
- make a purchase or request to personalise the Product;
- participate in the Monopoly By You event or related promotions; and
- send questions or comments to us, or contact Customer Service.

Depending on the nature of your activity on the Site, the types of Personal Data that you provide and we collect may include:

- your first and/or last name;
- email address;
- other information that you choose to provide and/or share on the Site which may be considered Personal Data.

Other Personal Data you may also provide through your use of the Product/Services includes your product preferences, searches, and browsing activity.

Please note that this Privacy Policy applies to any Personal Data that we collect (or that our service providers collect on our behalf) through your access and/or use of the Services or offline. If we collect and/or share Personal Data in a manner that differs from what is described in this Privacy Policy, we will notify you of the purposes for which such Personal Data will be collected and/or with whom such Personal Data will be shared (if applicable), whether via a just-in-time notification at the point of collection or via an alternate notice.

INFORMATION THAT WE COLLECT OR GENERATE ABOUT YOU

This includes:

- any information regarding the Products and/or Services purchased and/or used on the Site and our interactions with you;
- a file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the Product and/or Services which we have provided to you;
- activity data relating to you publishing content on the Site if applicable;
- any information that you choose to share on the Site which may be considered Personal Data; and
- any information we save in connection with placing an order on the Site (where you have asked us to save the information).

INFORMATION COLLECTED AUTOMATICALLY FROM YOU

When you access and/or use the Services, we may also automatically collect information about your visit. The types of information we and our service providers automatically collect include your computer's Internet Protocol ("IP") address, other unique identifiers (e.g. ad tags or IDs), information about your hardware, operating system version, browser type and language, screen resolution, geographic location (country, state, and city level), the URL of the website you visited before navigating to the Services, and other analytics and statistical data regarding your access to and/or use of the Services (e.g., downloads, number of users, access times, sessions, page views, frequency of use, retention, clicks, etc.). In addition to the above, if you access the Services via a mobile device, we may also collect your device ID, device make and model, and mobile carrier.

4. HOW DOES HASBRO USE MY INFORMATION?

We use your Personal Data collected through or in connection with the Products/Services for the business and commercial purposes described in this Privacy Policy or as otherwise disclosed to you in connection with the Services. The following are ways and purposes for which we may use your Personal Data:

- to provide and deliver the Products and/or Services you request, process your orders, and to send you related information, including confirmations;
- to provide you with access to the Site, its content and functionalities, including setting up and providing you with access to your account;
- to send you technical notices, updates, security alerts and support and administrative messages;
- to respond to your comments, questions, and requests and provide customer service;
- to understand feedback on products and services and to help quickly and easily provide more information on the use of those products and services;
- for direct marketing communications to help us offer you information about our products and services;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; or
- to carry out any other legitimate business or commercial purpose, at your direction or with notice to you or with your consent.

When we use Personal Data, we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons. These include:

- we need to do so in order to perform our contractual obligations with our customers and third-party providers;
- we have obtained your consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively and efficiently manage and administer the operation of the Site and our business;
 - maintaining compliance with internal policies and procedures;
 - direct marketing and advertising;
 - monitoring the use of our copyrighted materials; and

- enabling quick and easy access to information on the products and/or services.

5. WITH WHOM DOES HASBRO SHARE MY INFORMATION?

SHARING OF INFORMATION

We may share your Personal Data within the Hasbro group of companies for the purposes described above.

We may also share your Personal Data outside of the Hasbro group for the following purposes:

- with your consent, including if we notify you that the Personal Data you provide will be shared in a particular manner and you provide such Personal Data and consent to it being shared;
- with third party marketing agent Noonah Marketing Limited for the purposes of providing you with the Product/Services;
- when we believe it is necessary or appropriate to: (i) comply with applicable law or legal process or to respond to lawful requests or legal authorities; (ii) protect the rights and property of Hasbro and our employees, agents, users and other parties, including to enforce our agreements, policies and terms of use as provided on the Services, and protect against fraudulent, abusive, inappropriate, or unlawful use of the Services; and (iii) protect the safety of Hasbro, our users or any person or entity.

LINKING TO EXTERNAL SITES, APPLICATIONS, AND OTHER ONLINE SERVICES

To provide relevant information not found on the Services and to allow you to interact with other websites, applications, and/or other online services with which you may have accounts (such as Facebook and other social media sites) or which may be of interest to you, we may provide links or embed applications on the Services that allow you to login to or otherwise engage with online services not operated or controlled by us. Your use of these online services is subject to the other parties' privacy policies and terms of use, and we encourage you to read the other parties' privacy policies and terms of use before submitting Personal Data or other information or using their online services.

7. WHAT ARE MY INFORMATION CHOICES?

REGARDING ACCOUNTS

If you have created an account with the Services, you may at any time review and/or update the contact details and address information we have for you by signing into your account.

8. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Hasbro is a global business. Our customers and our operations are spread around the world. As a result, we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

Where we transfer your Personal Data to another country outside the UK or the European Economic Area (“EEA”), we will ensure that it is protected and transferred in a manner consistent with legal requirements.

In relation to data being transferred outside UK or the EEA, for example, this may be done in one of the following ways:

- the country that we send the data to might be approved by the European Commission and/or the UK authorities as offering an adequate level of protection for Personal Data;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission and/or the UK authorities, obliging them to protect your Personal Data;
- the recipient may have adhered to binding corporate rules (only for intragroup transfers); or
- in other circumstances the law may permit us to otherwise transfer your Personal Data outside EEA.

You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in section “Contact us” below.

9. HOW WE SAFEGUARD YOUR PERSONAL DATA

We have established controls and policies to maintain the security of our information and information systems and to protect your Personal Data against loss, misuse and unauthorized access, disclosure, alteration and/or destruction. When you contact a Hasbro employee about your use of the Services, transactions or Personal Data, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your Personal Data.

We also review our security procedures periodically to consider appropriate new technology and updated methods.

10. HOW LONG WE KEEP YOUR PERSONAL DATA

As soon as our agent Noonah Marketing Limited has provided with you the Product, your Personal Data will be permanently deleted from the Site.

11. YOUR RIGHTS

You may have the following rights in relation to your Personal Data:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to Hasbro;

- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data (including removing your account information) in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data, but we are legally entitled to retain it;
- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details listed in section “Contact Us” below.

You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.

12. CONTACT US

If you have questions or concerns regarding the processing of your Personal Data by Hasbro, this Privacy Policy, questions relating to consent, or in order to exercise the rights mentioned above, or if you have a disability and would like to access this Privacy Policy in an alternative format, please contact us using the following contact information:

Email: askhasbro@hasbro.co.uk

Free phone: 00800 2242 72 76

Or write to us at:

Hasbro Consumer Affairs Department

PO Box 43

Newport

Gwent NP19 4YH

For DPO requests, please contact us at DPO@hasbro.com.