


PRIVACY STATEMENT

Action respects your privacy. We treat the data you share with us with the utmost care. You can read more about how we do so in this Privacy Statement.

Together with Action Nederland B.V. (stores), Action Service & Distributie B.V. (headquarters and distribution centres) is the controller for processing your personal data as set out in this Privacy Statement. Action Service & Distributie B.V. defines the measures that Action takes to process your personal data pursuant to the applicable legislation.

This Privacy Statement provides you with information on the personal data Action processes when you visit our stores or website (www.action.com) or use the My Action programme.

	1. Which data do we process and why?
	1.1. Shopping at Action
	1.1.1. Purchases and orders in stores and VAT receipts <p>When you make a purchase in one of our Action stores, your payment details will be processed by our payment service (Adyen B.V.). At Action, you can pay for products in various ways. The data that will be processed depends on the payment method chosen. Such data includes the transaction, the payment method and the store in which you made the payment.</p> <p>This data will be used to process the payment prior to the purchase so we can execute the agreement with you.</p> <p>Your payment details may also be used to recognise and detect fraud. We have a legitimate interest to process your personal data for such purposes.</p> <p>Furthermore, we may also use said data for analytics purposes at an aggregated level. We have a legitimate interest to use your personal data for such purposes, as this allows us to understand how our customers use our services and subsequently improve and optimise them.</p> <p>In order to fulfil our legal obligation, we will store the details of your purchase and your payment details for seven years.</p> <p>You may also place orders in our Action stores if you would like to buy large numbers of our products. We require your name and telephone number so we can keep you informed of your order status and prepare the order.</p>

We process this data when drawing up the sales contract with you, and store it until you have picked up your order.

If you require a VAT receipt for your (business) records, you can request such a receipt while making your payment in-store. When creating VAT receipts, we are legally obliged to ask for your company's VAT number and address as well as your contact details (including your name and telephone number). As we have a legitimate interest in ensuring we maintain a thorough and orderly structure in our records, we may also create a profile for you in our system. We will then link all VAT receipts we have created for you to this profile.

In order to fulfil our legal obligation, we will store this profile (if applicable) and your VAT receipts for a maximum of 10 years.

Providing personal data for this purpose is not mandatory. If you do not provide any personal data, we will not be able to process your order and will not be able to create any VAT receipts for you.



1.1.2. Click & Collect and Shopping by appointment

In some Action stores, we offer Click & Collect and/or Shopping by appointment. These services may not be available in your country or region.

Click & Collect



Using the Click & Collect service, you can reserve products directly on our website and pick up and pay for them during a specific time slot at a store offering this service.




We require your name, telephone number, e-mail address and town or city to register your Click & Collect selections, confirm receipt of your order and keep you informed of the progress of your order. We process this data when drawing up the sales contract with you,

We will store your personal data for one month following the completion of your Click & Collect order. Your data will be anonymised once this period has expired and we will no longer be able to associate the data to you.

You can also log in to My Action to use the Click & Collect service. If you do this, we will use the contact details available in My Action for your Click & Collect order and you will only need to enter your phone number and town or city to confirm the order.

If you use Click & Collect while logged in to My Action, you will be able to view your Click & Collect orders under Purchases & Reservations. For more information about My Action, see 1.3.1. (My Action).

	<p>Shopping by appointment</p> <p>When using the Shopping by appointment service, you can make an appointment on our website so you can visit an Action store during a specific time slot.</p> <p>We require your name and e-mail address to register your shopping appointment, confirm receipt of your order and inform you of any changes to your appointment. We process this data when preparing to welcome you in the stores and for drawing up a sales contract with you. We also record this data as we wish to welcome the permitted number of customers in our stores safely. To this end, we have a legitimate interest to record appointments and communicate any important information or changes so we can ensure the health and safety of our customers and store employees.</p> <p>Once you have left the store, your personal data will be stored for 14 days and then anonymised. We will then no longer be able to associate the data to you.</p>
	<p>1.1.3. Asking a question or submitting a complaint</p> <p>Our Customer Service team is at your disposal to answer any questions and resolve complaints. You can reach them by telephone, on our website or social media channels, and at the Customer Service counters in our stores. If you have a question or issue you would like to raise, we will ask you for your name, e-mail address, telephone number and any other information that is necessary for dealing with your question or complaint. We believe that we have a legitimate interest to process your personal data for this purpose. We want to respond to and resolve your questions and complaints in a friendly and timely manner and will also keep you informed of the status of your question or complaint. This is part of our service and the Action customer experience.</p> <p>After your question or complaint has been dealt with, we will store your data for a maximum of two years, unless the nature of the question or complaint requires us to store the data for longer.</p> <p>Providing us with this personal data is not mandatory. If you do not provide any personal data, we may not be able to process or respond to your question or complaint.</p>
	<p>1.1.4. Camera surveillance</p> <p>All our stores are fitted with cameras. We have a legitimate interest to ensure your safety as well as that of our colleagues and products.</p>

	<p>We store our camera images for 28 days, unless there are well-founded reasons to store these images for a longer period (such as a police investigation).</p>
	<p>1.2. Online services</p>
	<p>1.2.1. Visiting the Action website</p> <p>Action uses cookies and other technologies on its website to optimise your user experience. Cookies are small information files that are saved on the device used (such as a computer, mobile phone or tablet) when visiting our website. Action uses different types of cookies. If you would like to know more about the cookies we use, please see our Cookie Statement.</p> <p>Removing or disabling cookies</p> <p>You can disable our cookies, though you should bear in mind that you may not be able to make full use of all the features on our website. You can read how to disable or remove cookies using the following links:</p> <ul style="list-style-type: none"> • Chrome: https://support.google.com/chrome/answer/95647? • Edge: https://support.microsoft.com/en-us/help/10607/microsoft-edge-view-delete-browser-history • Firefox: https://support.mozilla.org/en-US/kb/delete-browsing-search-download-history-firefox • Internet Explorer: https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11 • Opera: http://www.opera.com/blogs/news/2015/08/how-to-manage-cookies-in-opera/ • Safari (iOS): https://support.apple.com/en-us/HT201265 • Safari (macOS): https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac <p>Our website contains links to other websites such as Facebook, LinkedIn and Instagram. This Privacy Statement only applies to our website. We recommend that you also read the privacy statements for any other relevant websites.</p>
	<p>1.2.2. Wish lists</p> <p>If you have seen products you like on the Action website, you can add such products to your wish list. You can print your wish list out and take it with you to the store or simply send it to yourself by e-mail. We want to make shopping at Action as enjoyable as possible and help you find the products that suit you. We also have a legitimate interest to process your e-mail address so we can send you your wish list. We will store your e-mail address for one week after sending you your wish list.</p>
	<p>1.2.3. E-mail communications</p>

Newsletters

If you would like to receive all the latest news about our products, offers, and tips and trends, you are welcome to subscribe to our Action newsletters.

We believe it is important to communicate with our customers in a personal and relevant way. This is why we like to personalise the newsletter based on your data and interactions. When you sign up for our newsletters, you grant us your permission to use your e-mail address to send you personalised newsletters and other promotional e-mails.

We process the following data to do so:

- Information about the products you have viewed online (if you have accepted marketing cookies), your interactions with the newsletters and, where applicable, your participation in promotional campaigns, with a view to ensuring that our newsletters better match your interests using segmentation and data analysis.
- If you have shared information such as your name and date of birth, we will use it to make the newsletter more personal and, for example, to send you a birthday e-mail.

If you are a member of the My Action programme (see 1.3.1) and you have also signed up for the newsletter, we may also use your personal data, details about your use of the website, participation in the My Action programme and in-store purchases to further tailor the newsletter to your preferences. In this case, we will personalise the newsletter based on your consent for personalisation that you gave when you created your account, unless you have since withdrawn your consent for personalisation in your My Action account.



You will have the option to unsubscribe with each newsletter you receive. We will delete your data as soon as you unsubscribe from the newsletter.

Transactional e-mails

Alongside newsletters, we also send transactional e-mails. These are non-commercial e-mails that we send you to inform you about your interactions with us.

Such e-mails include order confirmations, account verification and/or password reset e-mails or e-mails containing important information such as changes to our terms and conditions.

We send these e-mails as we believe it is important to offer our customers a high-quality service, which involves communicating essential information as clearly as possible. In this light, we have a legitimate interest to send

	<p>such transactional e-mails. In order to avoid unwanted e-mails, we will always consider the purpose of the communication and only communicate essential information relating to your interactions with us.</p>
	<p>1.2.4. Social media</p> <p>Action uses social media to keep you informed of the latest products and promotional campaigns. You can follow us on Facebook, Twitter, Instagram, LinkedIn and YouTube. While Action does not require you to consent to terms and conditions for using social media, you will have to give your consent to the terms and conditions for the social media platform in question.</p> <p>Action uses advertising opportunities on social media platforms. We show you adverts based on data that the social media platforms collect with your consent. Such data may include the fact that you follow us, are interested in our products or live in a certain region. Action has no control over which data social media platforms collect about you. The terms and conditions (including the privacy statement) under which your data is collected are listed on the websites of the social media platforms.</p> <p>If you have given your consent on subscribing to our newsletters or in your My Action account, we will match the e-mail address where you receive our newsletter with the e-mail address that you use on social media platforms such as Facebook, Instagram, Pinterest and Google. This will take place in an encrypted, anonymised manner, meaning we will not give your e-mail address to such social media platforms. A match will only appear if you use the same e-mail address on such social media platforms. We will then be able to show you relevant adverts or make sure that you don't see adverts that you don't find interesting. If you have not given your consent, we will not take any action.</p>
	<p>1.3. My Action and promotions</p>
	<p>1.3.1. My Action</p> <p>You can create a My Action account on our website, and you can also sign up to the My Action programme.</p> <p>It is not possible to sign up to the My Action programme without providing your personal data. It goes without saying that you are not obliged to create a My Action account or sign up to the My Action programme.</p> <p>My Action account</p> <p>By creating an account for the My Action programme, you can benefit from a number of features. These include the following:</p>

- creating a shopping list so you always have your favourite products to hand.

In order to register and manage your My Action account, we process your name, e-mail address, password and date of birth. In addition, we also collect technical data such as the registration date, the last log-in date, and the geolocation of the log-in (based on the IP address). We process this personal data to enable the use of My Action and the technical platform in order to execute our agreement with you.

The personal data stored after registering for a My Action account will be kept for as long as your account is active.

If you do not use your account for more than one year, we will contact you to ask whether you still wish to keep your account. If we do not receive a response from you, we will deactivate your account. You can also have your account deactivated by contacting the Action Customer Service team.

Personalisation

When you participate in the My Action programme, we may also use your data to personalise your user experience, for example, by tailoring the content of the website to your interests.

To personalise the user experience, we use personal information such as your name, age and your use of the website using cookies and other tracking technologies (see also our Cookie Statement) as well as your purchases and online orders (such as Click & Collect).

We may also use this data to personalise our newsletters (see 1.2.3 – E-mail communication).

When you create a My Action account, you consent to the use of your data for personalisation purposes. You can change your consent for personalisation at any time in your My Action account.





Analysis

We may also use your data within My Action for analysis purposes at an aggregated level. We do this based on our legitimate interest to understand how our customers use our services so that we can then improve and optimise them.



1.3.2. Taking part in a promotional campaign

Action runs promotional campaigns, such as promotional games, competitions and price-drop campaigns on a regular basis. When you take part in a campaign or competition, it is important for us to know who is taking part. In order to register and/or confirm your participation and to be able to send you any prizes you may win, we need some information about you (your name, address and e-mail address). Depending on the campaign,

	<p>we also process information relating to your participation, such as scores or answers to a competition question. We process your personal data based on your consent.</p> <p>Providing your personal data for this purpose is not mandatory. If you do not provide this personal data, however, it will not be possible to process your participation in the campaign.</p> <p>If you take part in a campaign but do not have a My Action account, we will store your data relating to your participation in order to send you any prizes you may win or answer any questions about the campaign. We will store your data for up to three months following the end of the campaign. If you do hold a My Action account, we will store your data relating to your participation for as long as the account is active.</p>
	<p>2. How do we handle data relating to children?</p> <p>Our services are not marketed towards children. If you're not yet 16 years old, we will ask your parent(s) or legal guardian(s) for their consent so you can use our products and services.</p>
	<p>3. Protecting your personal data</p> <p>Action handles your personal data with the utmost care and attention. We have taken various technical and organisational measures to protect your personal data against loss and unlawful use. As a result, we have secured our systems and applications pursuant to the applicable information security standards. This also applies to any third parties acting on our behalf.</p>
	<p>4. With whom do we share your personal data?</p> <p>We may share your personal data with other Action entities. Action may also engage third parties in executing its activities. Such third parties may include marketing specialists to support us in campaigns and promotions and technical service providers for managing our customer database. Such third parties may only use your data for carrying out the relevant services. We make sure that these third parties handle your data with due care and attention and observe the applicable legislation and regulations. We will not share your information with third parties for marketing purposes.</p> <p>Action will, however, share your personal data with supervisory bodies, tax authorities and/or investigative authorities if legally obliged to do so.</p>
	<p>5. Transfer of personal data to countries outside the EEA</p> <p>Action uses third parties, such as technical service providers, to offer our products and services. Your personal data may therefore be processed in countries outside the European Economic Area (EEA). Action will only</p>

transfer your personal data if adequate protection of your personal data is guaranteed, and to this end will sign agreements with such third parties (including agreements concerning the European Commission's standard contractual clauses regarding data protection).
Contact our Customer Service team if you have any further questions about the measures we have taken to guarantee the security of your data when processed outside the EEA.



6. Your privacy rights

Your privacy is yours, and yours alone. You also hold several rights in this regard. You may contact our Customer Service team if you:

- would like to know whether we process your personal data or not and, if this is the case, would like to access your data (*right of access*);
- would like us to correct your personal data (*right of rectification*);
- would like to delete your personal data (*right of erasure*);
- would like us to transfer your personal data to another organisation (*right to data portability*);
- would like to withdraw your consent (*right to withdraw consent*);
- would like to restrict the processing of your personal data (*right to restriction of processing*);
- would like to object to the processing of your personal data if Action processes such data based on a legitimate interest (*right to object*).


If you wish to exercise one or more of these privacy rights, please contact Action's Customer Service team at:

Action Customer Service
Perenmarkt 15
1681 PG Zwaagdijk-Oost
E-mail: klantenservice@action.nl

In order to prevent fraud, we will ask you to provide certain information known to us so we can check that you are indeed the person to whom the personal data relates. We may also ask you to identify yourself. If it concerns a request to access personal data linked to a cookie, you should also submit a copy of the cookie in question. You can find this in your browser settings.

Right to submit a complaint

We would be happy to help you further should you have any complaints about the processing of your personal data. Should we fail to reach an

	<p>agreement, however, you also have the right to submit a complaint to the relevant data protection authority.</p>
	<p>7. Contact details</p> <p>If you have any questions or complaints about your privacy and/or this Privacy Statement, please contact our Data Protection Officer using the contact details below:</p> <p>Action Data Protection Officer Perenmarkt 15 1681 PG Zwaagdijk-Oost The Netherlands E-mail: privacy@action.nl</p>

This Privacy Statement was last updated on 15 February 2022.