



Fact sheet for B2C customers

Updated on: 07/10/20

Version 3.0

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Fact sheet for customers (B2C)

Your privacy is important to Repos Production. This fact sheet details how we process your personal data when you use the products or services provided by Repos Production.

This fact sheet sets out our approach to and purposes for processing personal data about you that we collect from you or that third parties lawfully disclose to us. 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 (including our website <https://shop.rprod.com> and our 7 Wonders, 7 Wonders Duel, 7 Wonders Companion and Time's Up! Party, Time's Up! Family, Doctor Panic applications) (hereinafter, the "Site" or the "Sites"), when you take part 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.

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1. Who is responsible for processing your personal data?

Repos Production, a Belgian limited liability company with its registered office at 22 rue des Comédiens in Brussels, 1000, Belgium and registered with the Crossroads Bank for Enterprises under number 0535.709.224 (hereinafter "Repos Production" or "we" or "us") is responsible for the processing of your personal data.

2. Minimum age

Maintaining the safety and privacy of children is very important to us. 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 holder of parental responsibility. You therefore 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 so, please contact us at the contact information indicated in Article 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 data such as your personal e-mail or postal address,
- Your personal characteristics such as your title, language,
- Your connection data (IP addresses, cookies) when you access our Sites; for more information, please consult our [Cookie Policy](#)¹,
- Your personal behaviour, 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 articles 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 your first and last name, ID, profile photo, date of birth,
- Your login data (IP addresses, cookies),
- Your personal characteristics such as language and city,

¹ <https://www.iubenda.com/privacy-policy/74214656/cookie-policy>



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- 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 Repos Production or for the execution of pre-contractual measures taken at your request.
2.	To manage your personal account on shop.rpod.com and our applications	This processing is necessary for the execution of the contract concluded between you and Repos Production.
3.	To manage contests or other promotional events, such as tournaments, and to inform the winners.	This processing is necessary for the execution of the contract between you and Repos Production and/or one of its partners.
4.	For game tests	This processing is based on your prior consent at the time of registration. You have the right to withdraw your consent at any time.
5.	To respond to your queries	This processing is based on our legitimate interest in communicating with our customers and/or users of our games and/or our applications and websites
6.	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 Repos Production to obtain your consent before sending you such information, Repos Production will rely on your prior consent to proceed with the processing.
7.	To comply with any applicable law, court order, legal process, or regulatory agency requirements.	This processing is necessary to comply with our legal obligations.
8.	To optimize the navigation on the Sites	We consider that it is in our legitimate interest to optimize our Sites.
9.	To improve our products and services	We consider that it is in our legitimate interest to improve our products and services.



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10.	To enforce our legal rights and obligations and for any legal proceedings involving you, initiated by or against you.	We consider that it is in our legitimate interest to protect our organization against any breach of a legal obligation owed to it and to defend ourselves in the event of a dispute.
11.	To protect the rights of third parties.	This processing is necessary to comply with the legal obligations to which Repos Production is subject. This processing is also necessary for the purposes of the legitimate interests pursued by Repos Production. We consider that we have a legitimate interest in ensuring that our activities do not violate the rights of third parties.
12.	In anticipation of and/or in connection with a business transaction such as a merger, acquisition, restructuring or sale.	We consider that it is 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.
13.	To ensure the security of your data	We consider that it is in our legitimate interest to ensure the security of your data.
14.	To produce 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 with various categories of third parties, according to our needs with the following categories of recipients:

- The other entities of the Asmodee group to which Repos Production belongs (the list of entities belonging to the Asmodee group is available [here](#)²),
- Third party service providers (maintenance, storage, payment, logistics, marketing services, etc.), which Repos Production uses for the purposes described in section 4 above,

Our main subcontractors are as follows:

- For the application development and support of 7 Wonders, 7 Wonders Duel, Time's Up Party, Time's Up Family applications: the French simplified joint stock company OUTER ZONE ENTERTAINMENT whose registered office is located at 31190 Miremont (France), 64 chemin de Mazade, registered on the Toulouse Trade and Companies Register under number 812 235 448,
- For the hosting of information systems: Amazon Web Service, Inc., whose registered office is at P.O. Box 81226, Seattle, WA 98108-1226, USA,

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



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- For internal storage and instant messaging, email messaging and calendars: MICROSOFT IRELAND OPERATIONS LIMITED, a company incorporated under the laws of Ireland, having its registered office at Sir Rogerson's Quay, 70, Dublin 2, Ireland, Trade Register Number 256796,
 - For promotional communications: Twilio EU, whose registered office is located at 25 N Wall Quay, North Wall, Dublin 1, D01 H104, Ireland,
 - For the productivity, collaboration and organization tools of our teams: the American company ASANA Inc. whose head office is located in San Francisco, CA 94103 (USA), Bryan Street, 1550, Suite 200,
 - For internal agenda management: SCHEDAPPLE LLC, a company incorporated in the United States of America, whose registered office is located at A307 Cheyenne Wyoming (USA), Capitol Avenue, 1603, Suite 310, company number 2015-000684737,
- Our professional advisors such as lawyers and accountants, auditors,
 - Shareholders,
 - Governmental or regulatory authorities,
 - Business insurers or all other relevant types of insurers,
 - Regulatory authorities / tax authorities / company registers, 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 Repos Production, 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 Repos Production.

In this context, your personal data may be transferred outside the European Economic Area (EEA), to countries not offering a level of protection of personal data equivalent to that offered within the EEA, such as China, USA, Canada, etc. In the absence of an adequacy decision of the European Commission, the transfer of your personal data will be made pursuant to the standard contractual clauses adopted by the European Commission or pursuant to any other legal protection mechanism in accordance with applicable law.

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 against unauthorized 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:

- **Withdrawal of consent.** 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.
- **Correction.** You can ask us to correct or complete your personal data if they are incorrect or incomplete.
- **Deletion.** 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 them without using them) when: their accuracy is contested; their processing is unlawful but you do not want them deleted; they are still necessary for the establishment, exercise or defense of 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; for the establishment, exercise or defense of 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 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 commercially by telephone, you can register free of charge on the "Ne m'appellez plus !" (Don't call me anymore) telephone canvassing opposition 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 Article 4). If you exercise this right, we must stop the processing unless we demonstrate the existence



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of legitimate and compelling reasons overriding your fundamental rights and freedoms, or for the establishment, exercise or defense of 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 complete this form³ and send it to us at the contact details provided.

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 email: 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 question concerning the protection of your personal data, please contact Repos Production:

- by post at the following address: Repos Production - Rue des Comédiens, 22 - 1000 Brussels
- by e-mail to the following address: gdpr@rprod.com

10. Updating of the fact sheet

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

Last update:

7 October 2020 - V3 Asmodee Group

26 October 2020 - Repos Production

January 6th, 2021 - Asmodee Group

³ <https://www.rprod.com/rgpd/fr/FORM.pdf>