

# MOOSE PRIVACY POLICY

Last updated: 23 July 2018

Moose is committed to safeguarding your privacy online. It is very important to us that you should be able to use and enjoy this website without having to worry about your privacy in any way. Please also view our children's privacy policy located at [Children's Privacy Policy \(https://www.moosetoys.com/privacy-policy#children-policy\)](https://www.moosetoys.com/privacy-policy#children-policy).

Please read the whole of this policy to understand how your personal information will be treated.

This policy may change from time to time, so please check back regularly. All changes will be posted on our website. The last updated date will be changed at the start of the amendment of the policy.

## Privacy Policy

This Privacy Policy ("Privacy Policy") describes the personal information that may be collected by us, what we use your personal information for, when we might disclose your personal information, the choices you can make about your personal information and how we handle your information.

This Privacy Policy applies to all websites (including all interactive features, applications or downloads available through these websites) and apps operated by Moose which contain this Privacy Policy (however accessed and/or used), whether via personal computers, mobile devices, or other technology ("Device") (collectively "Website"). By using the Website, you acknowledge that you've read and understood this Privacy Policy. Moose includes Moose Enterprise Pty Ltd, Moose Creative Pty Ltd, Moose Creative Management Pty Ltd, Moose Enterprise (INT) Pty Ltd, Moose Toys Pty Ltd, Moose Toys LLC and all of their subsidiaries and affiliated companies and are referred to in this policy as "we", "our" or "us".

## TABLE OF CONTENTS

MOOSE PRIVACY POLICY .....	1
Privacy Policy .....	1
TABLE OF CONTENTS.....	1
Collection of Personal Information.....	2
Customers .....	2
Using Personal Information .....	2
Direct marketing.....	3
Entrants in Competitions, Contests and Sweepstakes .....	3
Suppliers.....	3
Job Candidates.....	3
Disclosure.....	3
Accessing and checking the personal information we hold about you.....	4
Exceptions .....	4
Security.....	4
Information collected automatically.....	4
Cookies.....	5
How long do we keep your personal information .....	5
Contact Us.....	5
Changes to This Policy .....	5
Safety on the Internet .....	5
Assignment.....	5
Your California Privacy Rights .....	5
For Canadian Residents .....	5
MOOSE CHILDREN'S PRIVACY POLICY .....	6
PRIVO COPPA Seal Information and GDPRkids Privacy Assured Program.....	6
Data Subjects Rights .....	6

What kind of information does Moose collect? .....	6
A. Information provided by Children .....	6
B. Information collected through the use of our Website .....	7
How May Parents Access Children’s Personal Information? .....	7
What Does Moose Do With The Information We Collect? .....	7
Does Moose Share Any Information? .....	7
Security .....	7
Changes to the Children’s Privacy Policy .....	8
Contact Us .....	8

**Collection of Personal Information**

Personal information is information about an identifiable individual, or an individual who is reasonably identifiable whether the information is true or not.

**Customers**

We collect information that is directly related to the products and services you choose. The kind of personal information we collect can include: basic contact details (name, postal address, telephone number, or e-mail), demographic details such as age and/or gender, and products you are interested in.

Generally, we will collect personal information directly from you, and only to the extent necessary to provide the product or service you requested or to carry out our internal administrative operations. We may collect personal information from you when you:

- fill in an application form;
- deal with us over the telephone or through any Device;
- purchase a product;
- e-mail us;
- submit your personal details through the Website;
- create an account with us;
- ask us to contact you after visiting the Website; or
- agree to complete an on-line survey.

We may also collect solicited personal information indirectly, through some publicly available sources, or through social media sites, like Facebook, Twitter, Google and others, who disclose to their users that the users' personal information is provided to businesses like Moose. We will collect personal information from you by lawful and fair means and not in an unreasonable way.

**Using Personal Information**

We will collect, hold, use and disclose personal information for the purposes of providing or offering goods and services to you, for any purposes that you may reasonably expect, for any other purpose authorised by law, or for any other purposes with your consent (whether express or implied). This may include disclosures to organisations that provide us with technical and support services, and professional advice.

We use personal information in the following ways to:

- provide you with news and information about our products and services;
- provide, deliver, source, administer, and improve our products and services;
- provide marketing offers through direct marketing, database compilation, market research, data analysis and segmentation, and the processing or creation of other marketing information;
- communicate with you such as responding to queries and complaints;
- provide you with functionality on the Website, and customising and improving your online experience with us;
- personalise your experience with our products and services, for example, via connectivity with social media services;
- send you marketing and promotional material that we believe you may be interested in; or

- seek your feedback for market research purposes. Participation in feedback such as online surveys is completely voluntary and anonymous. It will not be used to gather identifying information about any individual

You may at any time request that we discontinue sending you emails or other communications.

Your personal information may also be used and disclosed to protect our rights or property and that of our users and, where appropriate, to comply with legal processes, which may include disclosures to law enforcement, regulatory or government agencies.

### **Direct marketing**

From time to time we may use the personal information we collect from you to identify particular products and services which we believe may be of interest to you. We may then contact you to let you know about these products and services and how they may benefit you. Every directly addressed marketing contact sent or made by Moose will include a means by which you may unsubscribe (or opt out) of receiving further marketing information.

California Civil Code Section 1798.83 permits customers of Moose who are California residents to request certain information regarding its disclosure of their personal information to third parties for their direct marketing purposes. Further, you may instruct us at any time to remove any previous consent you provided to receive marketing communications from us. Requests should be directed to our Data Protection Officer - [DPO@moosetoys.com](mailto:DPO@moosetoys.com).

### **Entrants in Competitions, Contests and Sweepstakes**

We may offer competitions, sweepstakes and contests through the Website that may require registration. By participating in a competition, contest or sweepstake, you agree to the terms, conditions and/or official rules that govern that particular promotion. If you choose to enter a competition, sweepstake or contest, we may disclose personal information to third parties or the public in connection with the administration of such competition, contest or sweepstake, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the official rules, such as on a winners' list.

### **Suppliers**

We collect information from suppliers that is directly related to the products and services Moose and its customers purchase and provide. This information may contain personal information such as the name and contact details of the contact people at each supplier. Generally, we will collect personal information directly from the contact person but some information may be provided by third parties.

We use information from suppliers in the following ways to:

- provide you with news and information about our products and services;
- be supplied, products or services;
- communicate including responding to queries and complaints;
- maintain quality control and product safety; or
- produce innovative products.

### **Job Candidates**

We collect information from job candidates. This information will contain personal information such as name, address, employment history and referee details. Generally, we will collect personal information directly from the job candidate but some information may be provided by third parties providing human resource services. Job candidate personal information will be used for recruitment purposes and to evaluate the job candidate's application. Where we wish to use the information for other purposes we will seek your agreement beforehand.

### **Disclosure**

We do not disclose personal information to third parties unless we are permitted to do so by law or you have given us your consent to do so. Third parties we may disclose personal information to include:

- our related companies;
- our service providers including IT service providers, major delivery companies, mail houses and third party fulfilment contractors;
- our professional advisors including our accountants, auditors and lawyers;
- payment system operators and financial institutions; or
- government agencies.

Some of our service providers provide services to us entirely or partly from locations outside your jurisdiction and we may in order to receive those services occasionally transfer personal information to such other jurisdictions (where the information may be available to the government of these other jurisdictions), including where:

- we use service providers, cloud computing solutions or data storage located in other jurisdictions;
- we, or our related bodies corporate, have offices in other jurisdictions;
- we need to comply with foreign legal or regulatory requirements; or
- an international payment has been made.

Your personal information may be stored or processed outside of the European Economic Area (EEA). These countries may not have the same data protection laws as the EEA. If we transfer your information outside of the EEA, we will take appropriate steps to ensure that your information is adequately protected.

### **Accessing and checking the personal information we hold about you**

You have the right to request access to the personal information we hold about you. This right is subject to certain exceptions (see below) allowed by law. The file containing your personal information will be kept on our servers and those of our service providers

Moose will, upon your request to the Data Protection Officer (see Contact Us), and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we ask that you identify, as clearly as possible, the type(s) of information requested. Moose will deal with your request in a reasonable time. Depending on the breadth of your request, we may recover from you our reasonable costs incurred in supplying you with access to this information.

We rely on the accuracy of the information you provide to us. If you think that we may hold information about you that is incorrect in any way, please contact us and we will correct any errors or inaccuracies where required.

### **Exceptions**

Your right to access your personal information is not absolute. In some circumstances, the law permits us to refuse your request to provide you with access to your personal information. Such circumstances may include where:

- access would pose a serious threat to the life or health of any individual;
- access would have an unreasonable impact on the privacy of others;
- the request is frivolous;
- the information relates to a commercially-sensitive decision-making process;
- access would be unlawful;
- access may prejudice enforcement activities, a security function or commercial negotiations.

### **Security**

Moose is committed to keeping your trust by protecting and securing your personal information. We have in place reasonable commercial standards of technology and operational security to protect all personal information provided to us from misuse, interference, loss, unauthorised access, modification or disclosure.

We limit access to personal information to individuals with a business need consistent with the reason the information was provided. We keep personal information only for as long as it is required for business purposes or by the law.

### **Information collected automatically**

We may collect information automatically such as browser type, operating system, and web pages visited to help us manage our Website.

We use cookies (see below) and other internet technologies to manage the Website and certain online products and services. Our internet server logs the following information which is provided by your browser for statistical purposes only:

- the type of browser and operating system you are using;
- your Internet Service Provider and top level domain name (for example - .com, .gov, .au, .uk etc);
- the address of any referring website (for example - the previous website you visited); and
- your computer's IP (Internet Protocol) address (a number which is unique to the machine through which you are connected to the internet).

This information is used by Moose for aggregated statistical analyses or systems administration purposes only. No attempt will be made to identify users or their browsing activities, except where required by law.

## **Cookies**

When you interact with us on the internet, our system automatically sends you a 'cookie'. A cookie is a small amount of information sent from a web server to your computer, electronic tablet or smart phone that enables your device to be recognised. It is used to handle your internet sessions on that device and contains a unique identifier.

Other information stored by the cookie includes website traffic data. This data is not used to identify individual details. We only collate the data into anonymous results in order to evaluate and improve our internet user ability and services. You may disable cookies using your browser's preferences, but some features of the Website may not function if you do so.

## **How long do we keep your personal information**

We will keep your personal information as long as your account is active or as long as it is needed to provide a product or service. If you would like to cancel your account or for us to delete your personal information, please contact our Data Protection Officer - [DPO@moosetoys.com](mailto:DPO@moosetoys.com). We will only keep information that we need for legal reasons, to resolve disputes or to enforce our agreements.

## **Contact Us**

If you have a query or question about this policy, please contact our Data Protection Officer at [DPO@moosetoys.com](mailto:DPO@moosetoys.com). Or by mail at: Data Protection Officer, 29 Grange Road, Cheltenham, Victoria, 3192, Australia.

If you would like to make a complaint about the way we process your personal data you can contact the relevant Data Protection Authority (DPA). Please contact us to find out more.

## **Changes to This Policy**

We will post changes to the Privacy Policy and publish the effective date when this policy is updated.

## **Safety on the Internet**

Please remember that whenever you voluntarily give personal information publicly online - for example on message boards, through e-mail, or in chat areas - that information can be collected and used by others. If you provide personal information on forums like that - you do so at your own risk.

## **Assignment**

We may change our ownership or corporate organisation or sell some of our assets. As a result, please be aware that in such event we may transfer some or all of your information to a company acquiring all or part of our assets or to another company with which we have merged. Under such circumstances we would, to the extent possible, require the acquiring party to follow the practices described in this Privacy Policy, as it may be amended from time to time. Nevertheless, we cannot promise that an acquiring company or the merged company will have the same privacy practices or treat your information the same as described in this Privacy Policy.

## **Your California Privacy Rights**

California Civil Code Section 1798.83 permits customers of Moose who are California residents to request certain information regarding its disclosure of their personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [DPO@moosetoys.com](mailto:DPO@moosetoys.com). These services will respect your browser's Do Not Track signals (or other well-established, commercially available mechanisms that provide you with the ability to exercise choice regarding the collection of Personal Information). If we receive a Do Not Track notice, we will stop using any Personal Information for online behavioral advertising purposes.

## **For Canadian Residents**

We may send you marketing communications by e-mail, text message or other electronic means unless you did not opt-in when required or have opted-out from receiving further messages. You may at any time opt out of the use of your personal information for marketing purposes by contacting our Data Protection Officer – see Contact Us above.

## MOOSE CHILDREN'S PRIVACY POLICY

Last updated: May 2018

We welcome children ("**Children**") to access all websites (including all interactive features, applications or downloads available through these websites) and apps operated by Moose which contains this Children's Privacy Policy (collectively "**Website**"). By using the Website, you acknowledge that you've read and understood this children's privacy policy. Moose includes Moose Enterprise Pty Ltd, Moose Creative Pty Ltd, Moose Creative Management Pty Ltd, Moose Enterprise (INT) Pty Ltd, Moose Toys Pty Ltd and all of their subsidiaries and affiliated companies and are referred to in this policy as "we", "our" or "us".

Moose complies with the Children's Online Privacy Protection Act of 1998 ("**COPPA**") and the GDPR. Please read our Children's Privacy Policy carefully as it explains our information collection practices for Children at our Website, such as the type of information we collect regarding Children and how we may use that information. It also describes a parent's or guardian's (each, a "**Parent**") ability to limit the collection and use of data collected from their Children. Please review our [Privacy Policy](#) that applies to our general information collection practices for visitors to our Website.

### PRIVO COPPA Seal Information and GDPRkids Privacy Assured Program

Insert PRIVO COPPA Seal information and GDPRkids Privacy Assured Program information when ready.

### Data Subjects Rights

- Correcting your Information – the right to have your personal information updated to ensure it is up-to-date and accurate.
- Withdrawing Consent – the right to withdraw your consent to any processing that is currently being done under your consent, e.g. marketing.
- Obtaining a copy of your Information – the right to receive a copy of the personal information we hold about you.
- Deleting your information – right to request that we delete personal information in certain circumstances.
- Data Portability – the right to have us transfer to another controller the personal information that you have provided us with.
- Restricting Processing – the right to request a restriction on the processing of your data in some limited circumstances.
- Right to object to processing – right to request that we stop processing your data for marketing purposes and in other limited circumstances such as asking us not to process your data by wholly automated means or not to analyse your information for targeted content etc. (also known as profiling).

For more information on how to action these rights please contact us at: [DPO@moosetoys.com](mailto:DPO@moosetoys.com)

### What kind of information does Moose collect?

#### A. Information provided by Children

Children may view much of the Website's content without registering or providing personal information (for example, first and last name, e-mail or postal address or telephone number (collectively, "**Personal Information**"). Moose may collect a Child's e-mail address under the following limited one-time use circumstances:

1. if your Child sends a request to us, we will keep their e-mail address to respond to them. We will then delete their e-mail address from our system once we have responded to them; or
2. if your Child enters a competition, sweepstake or contest, we will ask the Child to give us the Parent's e-mail address, too, so that we can tell the Parent that the Child has registered for the competition, sweepstake or contest. If we need more than the Child's e-mail address and first name (or screen name) to enter your Child in the competition, sweepstake or contest, we will notify you, explain what

information we need and ask that the Parent provide it. For example, we will ask the Parent for his or her mailing address so that we can send, for your Child, any prizes the Child wins, or for his or her telephone number so that we can tell the Parent when the Child has won. Any information a Parent or the Child gives us in these circumstances will be deleted from our database once the competition, sweepstake or contest is concluded, and after any legally required period for keeping such information has ended.

Other than the one-time use exceptions set out above, if a Child registers to provide more than just the Child's e-mail address in order for the Child to participate in a particular activity, such as receiving e-mail newsletters or samples or tracking collectibles, we will ask the Child for the Parent's e-mail address so that we can notify the Parent of the Child's request and obtain the Parent's permission. When we ask for the Parent's permission, we will tell the Parent what we will do with the information the Parent or Child provides us. We will not keep the Child's e-mail address unless the Parent gives us permission to do so.

#### B. Information collected through the use of our Website

Moose collects information on our Website's visitors collectively including which sections of the Website are most frequently visited, how often and for how long (collectively, "**Usage Information**"). This is done through cookies and other technologies. This data is used as aggregated, non-Personal Information. Cookies **do not** contain any Personal Information about a specific user. Moose uses Usage Information to improve and enhance our online service. You may disable cookies using your browser's preferences, but some features of the Website may not function if you do so. We do not share this information externally. For more information about our technology practices, please review our general [Privacy Policy](#).

#### **How May Parents Access Children's Personal Information?**

If a Parent no longer wishes the Child to participate in an activity offered through our Website, such as an e-mail newsletter, simply click on the opt out link that is provided or contact us at [DPO@moosetoys.com](mailto:DPO@moosetoys.com). Upon proper identification, a Parent may review the Personal Information we have collected about the Child, request deletion, or refuse to allow further collection or use of that information. When we delete Personal Information, it will be deleted from our active databases and deleted after any legally required period for keeping such information has ended.

#### **What Does Moose Do With The Information We Collect?**

We may use a Child's Personal Information or Usage Information: (1) to enable a Child to participate in a variety of the Website's features such as to track collectables or enter competitions, sweepstakes or contests; (2) to process a Child's registration with the Website; (3) to improve the Website or to serve the Child specific content that is most relevant to the Child; (4) to contact the Child and Parent with regard to the Child's use of the Website and, in our discretion, changes to the Website and/or Website's policies; or (5) for purposes disclosed at the time the Child provides their information or as otherwise set out in this Privacy Policy.

#### **Does Moose Share Any Information?**

We do not disclose Children's Personal Information to third parties. We may share some or all of the Child's Personal Information within Moose or any subsidiary or affiliated companies for our internal business purposes. We require our subsidiary or affiliated companies to comply with this Privacy Policy.

We may transfer and disclose your Child's Personal Information, to third parties. For more information on these third parties, please contact Moose: [DPO@moosetoys.com](mailto:DPO@moosetoys.com) 1) in the event we are required to respond to subpoenas or other legal process or if in our good faith opinion such disclosure is required by law; (2) at the request of governmental authorities conducting an investigation; (3) to protect and/or defend the Website's [Terms of Use](#) (link); or (4) to protect the personal safety or rights of any individual. We may also use IP address or other device identifiers to identify users, and may do so in cooperation with copyright owners, internet service providers, wireless service providers or law enforcement agencies in our discretion. Such disclosures may be carried out without notice to you.

In the event Moose goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, Personal Information will likely be among the assets transferred. Any acquirer of Children's Personal Information held by Moose will continue to abide by this Children's Privacy Policy.

#### **Security**

We incorporate commercially reasonable safeguards to help protect and secure your Personal Information. However, no data transmission over the Internet, wireless transmission or electronic storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use our Website and provide us with your information at your risk.

### **Changes to the Children's Privacy Policy**

Moose reserves the right to change this Children's Privacy Policy at any time. All changes will be posted on our website. Any changes will be effective immediately upon the posting of the revised Children's Privacy Policy and updated date. However, Moose will not use your Child's Personal Information in a manner materially different than what was stated at the time it was collected without first obtaining a Parent's consent.

### **Contact Us**

If you have a query or question about this policy, please contact our Data Protection Officer at [DPO@moosetoys.com](mailto:DPO@moosetoys.com). Or by mail at: Data Protection Officer, 29 Grange Road, Cheltenham, Victoria, 3192, Australia.

If you are an EU citizen and would like to make a complaint about the way we process your personal data you can contact the relevant Data Protection Authority (DPA). Please contact us to find out more.