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PRIVACY POLICY

Effective date: 25 May 2018

This Privacy Policy details the privacy practices of Specialized (UK) Limited, a company registered in England and Wales with a registered office at 65 Woodbridge Road, Guildford, Surrey, GU1 4RD (ICO Data Protection Registration Number Z6430423).

Specialized (UK) Ltd. is a subsidiary of Specialized Bicycle Components, Inc., 15130 Concord Circle, Morgan Hill, CA 95037, ("Specialized", "we", "us", or "our"). Please read below and learn how Specialized collects, uses and shares your information through a variety of digital means, including any of our mobile applications, websites or other Specialized products or services (collectively, "Services") that link to or refer to this Privacy Policy, and your choices and rights regarding that information. Other Specialized Services may have different privacy policies. If you have questions about this Privacy Policy you can contact us at PrivacyCare@specialized.com.

What Information Do We Collect?

- Information you provide to us when you use our Services, including your contact information, your login and password used to access the Services, activity and performance information, information about measurements taken at a retailer so we can recommend the best product for you, and credit card information.
- Information about the computers and devices you use to access our Services, including their location.
- Information about your use of our Services, including your purchases, frequency of rides on the bicycle, starting location and ending location of your rides, and information about your bicycle. We use cookies, beacons and other tracking technologies to collect this information.
- With your prior consent, we may also collect or allow authorized service providers to collect information about your precise mobile device location.

[Learn More](#)

How Do We Use Your Personal Information?

How Do We Use Your Personal Information?

- To process your orders and fulfil your service requests.
- To make product recommendations based on your measurements.
- To provide our products and the Services to you.
- To deliver your purchases.

Why Your Information is Used

To allow us to satisfy our contractual obligation to you.

-
- To send you emails, newsletters and other marketing communications.

When you have given us your consent for these uses.

- To tell you about offers we think you will value.
-

- To protect the security of our Services.
- To enforce our terms and conditions.
- To conduct market research and audience analysis, which allows us to understand who our customers are and the products/services they would like us to provide.
- To customize the content and advertising you see on our Services and to recognize you as a previous visitor.

We have legitimate business interests in engaging in these activities and it may not be feasible to obtain your consent. We protect your rights by notifying you of this use, notifying you of your rights, and limiting amount of information we use to only what is needed to fulfill these purposes.

[Learn More](#)

Who Do We Share Your Information With?

- **Other Specialized businesses:** We share information with our affiliates where acceptable under applicable law.
- **Third Party Service Providers:** We instruct other companies and individuals to perform services on our behalf. Examples include processing payments, sending e-mail, analysing data, providing marketing assistance and responding to customer service requests.
- **Business Transfers:** If we are acquired or merge with another company, we will share your Personal Information with that company.

[Learn More](#)

How Long Do We Keep Your Information?

We keep your information for as long as you have an account with us or are otherwise an active customer of Specialized. Once you delete your account or no longer use our products and Services, we will only keep your information as needed to fulfill our legal obligations or if it is in our legitimate interests to do so.

[Learn More](#)

Your Rights and Choices

We provide you with the ability to opt-out of promotional messages and interest-based advertising. If you are in the European Economic Area (EEA), you have the right to:

- Access the information we have about you and to request that we correct or update it as needed.
- Request a copy of the information we have about you.
- Request that we delete the information we have about you.
- Withdraw your consent to the processing of your information or request that we limit how we use your information.

You may exercise your rights by submitting a request here: [Subject Access Request Form](#)

[Learn More](#)

Transfers of Personal Information to the United States

Specialized is a global company with a headquarters in the United States where the privacy laws may not be as protective as the laws in your country. We protect your information when it is transferred out of your country using both contracts and industry standard security measures.

[Learn More](#)

What Information Do We Collect?

We collect information you voluntarily provide, as well as information that your computer, mobile phone, tablet, console or other device (collectively, "Device") or browser provides automatically. We use cookies to make the Services perform better for you and for advertising purposes. You can opt out of the use of cookies, but if you do, some features of the Services will not work correctly.

Information You Provide To Us: We, or our service providers (acting on our behalf), collect "Personal Information" (which is information that, on its own or when combined with other information, can be used to identify you) that you provide to us, such as your first and last name, gender, image, email address, telephone number(s), postal address, post code, billing address, age, birth date, profile, location information, activity and performance information, avatar, weight, height, e-bike-specific information, emergency contact details, and when necessary, credit card information.

We collect information from you when you:

- Place an order from our Services;
- Return an item or make an exchange;
- Inquire about our Services;
- Create an account via our Services;
- Sign up for email updates or to receive our newsletter and/or advertisements;
- Register and use your bicycle;
- Enter a contest or sweepstakes;
- Use a Service that requests information regarding your location;
- Are referred to us through a marketing promotion; or
- Participate in a marketing survey, promotion or event.

Information Collected Automatically: Whenever you visit or interact with the Services, we, as well as our third-party service providers, use a variety of technologies that automatically or passively collect information about how you access and use the Services ("Usage Information"). Usage Information includes:

- Your IP address or other unique identifier for your Device.
- Device type.
- Your location.
- The type of browser software and operating system you are using.
- The web page(s) you have accessed, and the time you accessed them.

We also automatically collect certain other information, including:

- information about your purchases and purchase history;

- frequency of rides on your bicycle;
- starting location and ending location of your rides;
- power consumption during your rides;
- error occurrences with respect to the battery of the bicycle;
- motor and bicycle serial numbers and the hardware version you are using;
- rider behaviour (using analytics), rider preferences, ride history, rider performance statistics (e.g., length of rides, distance covered);
- elevation gain & loss, rider power, cadence, speed, average speed and elevation gain uphill);
- data from chat features; and
- billing history, log data and error reporting.

Cookies: We, and/or our third party service providers, place “cookies” (data files placed on a Device when it is used to visit our website), on your Device to collect Usage Information, for security purposes, and to enable you to use the Services, as well as for market research related purposes. To read our cookie policy, go to <https://www.specialized.com/eu-cookie>. To learn how to reduce the number of cookies you receive, or delete cookies that have already been installed in your browser’s cookie folder, please refer to your browser’s help menu or other instructions related to your browser. You can also learn more about cookies by visiting <https://ico.org.uk/for-the-public/online/cookies>, which includes additional useful information on cookies and how to block cookies using different types of browsers.

Google Analytics: We use a tool called “Google Analytics” to collect information about your internet use. For example, how often you visit our site, the pages you visit, and what other Sites you may have visited prior to coming to our site. We use Google Analytics to gain insights into how our services are used and to help us improve our products and services. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. To opt-out of Google Analytics, please use Google’s opt-out tool: <https://tools.google.com/dlpage/gaoptout>.

Do Not Track: Currently the Service is not designed to respond to “Do Not Track” signals sent from your browser.

How Do We Use Your Personal Information?

We use the information we collect about you to provide you with products and services, to improve your experience, and to enforce our rights.

We use the Personal Information we collect about and from you:

- To perform our responsibilities under a contract we have with you. For example:
 - If you purchase goods using the Services, we will need to use your Personal Information to process your order and to enable

delivery;

- If you ask us to recommend products based on your metrics, we will need to use your Personal Information to match you with products we think would work best for you; and
- We will need to use your Personal Information to perform our obligations under our app or website terms of use.
- When we have a legitimate interest to do so. For example:
 - To prevent fraud and protect the security of our Services;
 - To enforce our Terms of Use;
 - To communicate updates and improvements;
 - To carry out market research;
 - To develop and optimize our products and services;
 - To let you know when your bike needs servicing;
 - To understand how a specific e-bike is performing, e.g., if errors are logged, Specialized will identify the specific e-bike and send fixes and software updates to that particular e-bike to resolve the error;
 - To help us provide and operate the Service; and
 - To comply with our legal obligations.

If you have purchased products and services from us, we may also send you marketing communications about similar products and services.

- With your consent. For example:
 - We send certain marketing communications to you only if you consent to receive them.
 - We do not share your Personal Information with third parties for their direct marketing purposes without your consent.
 - If you consent, we use your health information to provide you with statistics and visualisations representing key data points like heart rate.
 - We will store your Personal Information if you consent to serve as emergency contact for a friend or family member who owns one of our smart helmets.
 - With your consent, we use your information to personalize your Specialized experience, including: to tailor content, advertisements, and offers we serve you.

Who Do We Share Your Information With?

We share your information with our affiliates and service providers. We will also share your information if we reorganize our business. We will share Personal Information as necessary to enforce our legal rights or meet our legal obligations.

We share your Personal Information with third parties in the following circumstances:

- **Affiliates:** Other Specialized businesses (our “Affiliates”) jointly use the Personal Information for the purposes described in this Privacy Policy, where this is acceptable under applicable law.
- **Third Party Service Providers:** We use third parties to help us provide the Services to you. Third parties we use for payment processing, email, marketing, customer service and other services will access your Personal Information to help us provide these services to you. We will provide your Personal Information to these third-party service providers when the information is necessary for them to perform their duties. For example we will share bank details and credit card information with payment providers that process rider payments (where applicable).
- **Business Transfers:** We will share your Personal Information if we are acquired by or enter into a merger with another company, or otherwise reorganize our business.
- **With Third Parties, Where Necessary for Legal Reasons:** We will transfer and disclose your Personal Information to third parties where we need to do so in order to conform to the requirements of the law or comply with legal process served upon us, to make sure you are complying with our Terms of Use or other applicable policies, to investigate possible fraud, or to help investigate or fix any security or technical issues relating to the Services.

Third Party Links and Services

We link to sites operated by other parties, but we are not responsible for their privacy practices. If you link your Specialized account with your account on another site or service, we will have access to information you have shared with that third party.

The Services and some of our email communications contain links to other sites that we are not responsible for. We do not control, recommend or endorse these other sites. These other sites may also collect personal information about you, and they may have their own privacy policies. We recommend that you review the privacy policy of any site that you access through the Services.

You may choose to link your Specialized account with your accounts with third-party services, such as Strava or Facebook. If you do this, Specialized has access to information that you have agreed to make available with the third party, such as profile information and account preferences. You can control the information received by Specialized via the privacy settings in the third party account.

Children

We do not knowingly collect Personal Information from children.

The Services are not designed for or directed at children. As such, we do not knowingly process Personal Information about children under 16 years of age.

Transfers of Personal Information to the United States

Specialized is a global company with headquarters in the United States. Your Personal Information will be transferred to our United States headquarters. We take measures to protect privacy when data is transferred.

Specialized has its headquarters in the United States of America. Information we collect from you will be processed in the United States. The laws of the United States may not protect the privacy of your information at the same level as provided by the laws of your country. In an effort to safeguard individual privacy, Specialized enters into agreements using standard contract clauses, approved by the European Commission, with our service providers and Affiliates that transfer Personal Information to the United States. You will not lose any rights or choices you have about the use of your Personal Information when it is transferred to the United States.

Storage of Your Personal Information

We keep your information for as long as you have an account with or are otherwise an active customer of Specialized. Once you delete your account or no longer use our products and Services, we will only keep your information as needed to fulfil our legal obligations, resolve disputes, enforce our agreements, or take other actions permitted by law.

We will generally store information associated with your account until it is no longer necessary to provide the Services, until you ask us to delete it, or until your account is deleted, whichever comes first; but there are some exceptions to this general rule. We will retain information from deleted accounts to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, process warranty claims, distribute important product information (such as recall information), enforce our agreements, and take other actions permitted by law.

You can request deletion of your Personal Information at any time by contacting our Data Privacy Specialist using the contact details set out below.

Security Measures

We use technical and organizational security measures to protect your information, but we cannot guarantee they will be 100% effective.

We use a variety of current technologies and processes and maintain physical, technical and administrative safeguards for the protection of our customer data. We maintain a private database on our servers for the storage of all information collected through our Services. It is our practice to use encryption whenever we receive or transmit sensitive data. We use encryption technology to ensure the secure transmission of any personal information you provide while using our Services. All transactions completed through our Services are conducted using 2048-bit Secure Sockets Layer (SSL) encryption. We will take reasonable measures which we believe are appropriate to protect your information from loss, misuse, alteration or destruction, and, where possible, will ask that any third parties to whom we may transfer your information take comparable steps to protect that security. Although we will use all reasonable efforts to safeguard the confidentiality of your Personal Information, we cannot guarantee that your information will always be secure.

Email is not a secure form of communication. Please do not send us your credit card number, social security number or other Personal Information via email.

Your Rights and Choices

We provide you with the ability to opt-out of promotional messages and interest-based advertising. If you are in the EEA, you have the right to access the information we have about you, as well as the right to request that we correct it, complete it, erase it, stop using it, or transfer it to you. Submit your request for information here: [Subject Access Request Form](#).

You can stop receiving promotional communications from us by following the opt-out instructions provided in any such communication you receive. You can also email PrivacyCare@specialized.com.

You may view and opt-out of tracking cookies for any company that participates in the Digital Advertising Alliance Consumer Choice program at <http://www.aboutads.info/choices/>.

If you are in the EU, you have certain rights related to the Personal Information we hold about you:

- **Access.** You have the right to access the Personal Information we hold about you. If you wish to obtain a copy or description of the Personal Information we hold about you, please use our [Subject Access Request Form](#). If you are unable to use the form, you may send your request to our Data Privacy Specialist (e.g., email or by post) using the contact details set out below. In

either case, we may ask you to verify your identity and to provide further details about your request.

- **Accuracy.** We will do our bests to ensure the Personal Information we retain about you is accurate. We may from time to time send you an email update to remind you to tell us about any updates or changes to your Personal Information. You have the right to request that any inaccurate Personal Information is corrected and any incomplete information is completed by contacting our Data Privacy Specialist using the contact details set out below.
- **Deletion and Processing Restriction Requests.** You have the right to request that we delete Personal Information that we hold about you. You also have the right to ask us to stop processing your Personal Information, subject to certain exceptions. If you would like us to erase or stop processing the Personal Information that we hold about you, please contact our Data Privacy Specialist using the contact details set out below.
- **Portability Requests.** You have the right to request that we provide certain parts of your Personal Information to you or transmit it directly to another company that processes Personal Information. If you would like us to transfer your Personal Information, please contact our Data Privacy Specialist using the contact details set out below.
- **Withdrawing Your Consent to Receive Marketing Messages.** You may ask us to stop using your Personal Information for advertising or marketing purposes at any time. If you wish to do this, please follow the removal instructions in any communication you receive, or send us an email to PrivacyCare@specialized.com with "UNSUBSCRIBE" in the subject line.

Changes to our Privacy Policy

We may change our privacy practices, and we will update this page when we do, so be sure to check it periodically.

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes we will provide you with a prominent notification prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Queries or Complaints

Please contact us with questions. If you are dissatisfied with how we use your Personal Information, you can complain to our Data Privacy Specialist or to the data protection authority in your country.

If you have any questions or concerns about this Privacy Policy, the Services, or about our use of your Personal Information, please contact our Data Privacy Specialist using the contact details set out below. In addition, if you have any complaints about how we use your Personal Information, you have the right to lodge a complaint with the data protection authority in your country. A list of data protection authorities is available at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

Our Contact Details

You may contact our Data Privacy Specialist using the following details:

By email:

PrivacyCare@specialized.com

Post:

Data Privacy Specialist,
Specialized UK Lt.d,
29 Barwell Business Park, Leatherhead Road
Chessington KT9 2NY
United Kingdom

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