

Privacy policy VSTEP B.V.

25 May 2018

Introduction

VSTEP B.V. (“VSTEP”, “we” or “us”) respects and protects the privacy of visitors to our websites and our customers who use our services according to the General Data Protection Regulation (“GDPR”). This privacy policy describes VSTEP’s information handling practices when you access content we own or operate on the websites vstepsimulation.com and shipsim.com (“Sites”) and all other related services, such as the ShipSim games (“Services”).

Acceptance of privacy policy

By accessing and using our Sites and Services you accept to the terms of this privacy policy. If we need your consent to process your personal information, we will ask you for your consent to the collection, use and disclosure of your personal information as described further below.

If you do not agree with this privacy policy, you should immediately discontinue access or use of our Services.

Changes to this privacy policy

VSTEP reserves the right to modify this privacy policy at any time. If any material changes to this privacy policy are made, we will notify you by e-mail.

Personal information collected

VSTEP will only collect personal information from you if we have a legal ground to this end under the GDPR, which might consist of your consent, a contract or a legal obligation hereto.

Registration data

VSTEP collects personal information when users register themselves for our Services and Sites. Depending on the Service or Site, collected personal information could consists of name, address, date of birth, gender, and country.

Usage, log data & cookies

When you use or interact with our Sites and Services, VSTEP also collects data on the usage of our Sites and Services, for which log data and cookies are applied. Cookies are small files our Sites can use to recognize repeat users and allow us to observe behavior and compile aggregate data in order to improve our Sites for you. The cookies are anonymous by default and are therefore not able to personally identify you.

Payment data

If you make purchases through our Sites and Services, your credit or debit card information (such as card type and expiration date) and other financial data that we need to process your payment may be collected and stored by us and/or the payment processors with which we work. We may also collect other data necessary to provide our Services, such as your postal code and details of your transaction history.

How we share personal information

The personal information that we gather are only accessible to those within VSTEP who really need to in order to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. VSTEP will never sell your personal information. Personal information is shared in the following circumstances:

- Your information may be shared with service providers under contract who help with parts of our business operations such as accounting, marketing, and technology services. In accordance with the GDPR, we have data processing contracts with these third parties, which requires these services to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else. Third parties have to be comply to the same standard of privacy regulations as VSTEP.
- We share your information with financial institutions with which we partner to process payments you have authorized.
- We may share your information with entities that we plan to merge with or be acquired by. Should this occur, we will require that the new entity follow this privacy policy with respect to your personal information.

Your rights in relation to the use of your personal information

You have the following rights for personal information that we have of you:

- Deleting your personal information: you can ask us to delete (parts of) your personal information.
- Correcting or modifying your personal information: you can ask us to modify, update or correct your personal information.
- Objecting to the use of personal information: you can ask us to stop using all or part of your personal information or to limit its use.
- Access to your personal information: you can ask us to provide you with a digital copy of the personal information that we possess of you.

These rights can be exercised by contacting us via e-mail at info@vstepsimulation.com or by writing to us at the following address:

VSTEP B.V.
Weena 690
3012CN Rotterdam
The Netherlands

Other important information

Children's personal information

VSTEP does not knowingly request to collect personal information from or sell products to any person under the age of 18. If you are under 18, you may only purchase VSTEP products with the involvement of a parent or guardian.

Security

Our Sites and Services use security systems that protect your personal information from unauthorized use. We monitor our systems regularly for possible security risks, but we are not able to guarantee the safety of information sent by you.

Legal grounds for processing personal information

VSTEP only collects and processes personal information when a legal ground, in accordance with the GDPR, exists. Legal grounds could consist of a contract, permission given by you or other reasons.

How to contact us

If you have any questions or concerns with regard to this privacy policy, or if you have a complaint, you can contact us at info@vstepsimulation.com or by writing to us at:

VSTEP B.V.
Weena 690
3012CN Rotterdam
The Netherlands

Complaints

You can also complain about our processing of your personal information to the relevant data protection authority in the country where you live or work, or in the place where the alleged breach of data protection law has taken place. For the Netherlands this authority is the Autoriteit Persoonsgegevens, who can be reached through their [website](#) or by phone on +31 (0) 88 – 1805 250.