

## Privacy & Cookie Policy VSTEP B.V.

### Privacy Policy

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.

#### 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](mailto: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 send 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](mailto: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.

## Cookie Policy

This is the Cookie Policy for VSTEP Simulation, accessible from [vstepsimulation.com](http://vstepsimulation.com)

### What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

For more general information on cookies see the Wikipedia article on HTTP Cookies.

### How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

### Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other

websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies.

### **The Cookies We Set**

- 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.

- Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- Orders processing related cookies

This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.

- Surveys related cookies

From time to time we offer user surveys and questionnaires to provide you with interesting insights, helpful tools, or to understand our user base more accurately. These surveys may use cookies to remember who has already taken part in a survey or to provide you with accurate results after you change pages.

### **Third Party Cookies**

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.

- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst ensuring we understand which optimisations our users appreciate the most.
- As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.

## More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

However if you are still looking for more information then you can contact us through one of our preferred contact methods:

- Email: [info@vstepsimulation.com](mailto:info@vstepsimulation.com)