

Privacy Policy
Effective 29 June 2022:

INTRODUCTION

The “Real Play Coalition” is a coalition with the ambition to influence society to change systems and integrate play as a fundamental development tool to prepare children for future success. The Real Play Coalition is composed by:

- **The Walt Disney Company Ltd.**, a company according to the laws of England, registered under no. 530051 and with legal head office at 3 Queen Caroline Street, Hammersmith, London W6 9PE, England (hereinafter, “**Disney**”);
- **Ingka Services BV**, a company according to the laws of the Netherlands, registered in the Netherlands under no. 33 17 37 51 and with registered legal head office at Bargelaan 20, 2333 CT Leiden, The Netherlands (hereinafter “**IKEA**”);
- **LEGO Fonden**, a Foundation according to the laws of Denmark, registered under no. 12458339 and with legal head office at Højmarksvej 8, st., 7190 Billund, Denmark (hereinafter, “**LEGO**”); and
- **Ove Arup & Partners International Ltd**, a company according to the laws of England, registered under no. 952468 and with legal head office at 8 Fitzroy Street, London, W1T 4BJ, United Kingdom (hereinafter “**ARUP**”).

DISNEY, IKEA, LEGO and ARUP are the founding members of the Real Play Coalition (collectively referred to as the “**Real Play Coalition**” or “**we**”) which share the common belief in the power of play.

In particular, in this Privacy Policy, we want to inform you about how we collect, use and disclose personal data from and about you, through this website <https://realplaycoalition.com/> (hereinafter, the “**Website**”).

You can find a Table of Contents and a brief summary of this Privacy Policy in the chart below. For further details with regard to the data processing carried out by the Real Play Coalition, click on the links in each section of the summary.

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	Issue	Information
1.	What and who does this Privacy Policy cover?	<p>DISNEY, IKEA, LEGO and ARUP are the joint controllers of your personal data collected through the Website.</p> <p>This Privacy Policy applies to all users, including both those who navigate the Website without being registered or logged-in and those who have registered to the Website or logged-in the personal account.</p> <p>For further information, please see section 1</p>
2.	What kind of personal data do we collect about you?	<p>The Real Play Coalition might collect data from and about you.</p> <p>More specifically, the Real Play Coalition collects (1) registration data, (2) public data and posts, (3) data that you have permitted social media to share with the Real Play Coalition, and (4) activity data on the use of the Website.</p> <p>However, we do not collect any sensitive data relating to you.</p> <p>For further information, please see section 2</p>
3.	Why do we collect your personal data?	<p>The main reason why we collect data about you is to allow you to benefit from the Real Play Coalition activities, as well as interact with the Website, also allowing you to sign up to the Website and Real Play Coalition initiatives.</p> <p>In addition, with your prior consent, we can send you information and news on Real Play Coalition activities and initiatives, events and projects.</p> <p>For further information, please see section 3</p>
4.	On what legal bases do we use your personal data?	<p>Your personal data is mainly collected in order to provide you with our services, as well to allow you to participate in our activities and initiatives.</p> <p>Your personal data is also necessarily collected to comply with legal obligation or to protect the legitimate interest of the Real Play Coalition.</p> <p>Failure to provide such data will make it</p>

		<p>impossible to offer you the Real Play Coalition services.</p> <p>When your personal data is collected for marketing purposes, you have the option not to provide us with your personal data.</p> <p>For further information, please see section 4</p>
5.	How do we process your personal data?	<p>The security of your data is a priority for us. For this purpose, we have implemented adequate administrative, technical and physical measures designed to safeguard your personal data against loss, theft and unauthorized use, disclosure or modification.</p> <p>For further information, please see section 5</p>
6.	Who can access to your personal data?	<p>The Real Play Coalition might share your personal data with (i) service providers, (ii) affiliated companies of DISNEY, IKEA, LEGO and ARUP and (iii) national authorities, when allowed by the applicable laws.</p> <p>For further information, please see section 6</p>
7.	Is your personal data transferred abroad?	<p>Your personal data might be transferred to other countries within or outside the European Economic Area. In any case, we always make sure that appropriate and suitable safeguards compliant with applicable laws are in place to protect your personal data.</p> <p>For further information, please see section 7</p>
8.	What are your rights with regard to your personal data?	<p>According to the EU General Data Protection Regulation 2016/679 (the so called "GDPR"), you have, among others, the right to access, complete, update, amend and delete your personal data.</p> <p>For further information, please see section 8</p>
9.	For how long do we keep your personal data?	<p>You personal data will be generally stored in the systems of DISNEY, IKEA, LEGO and ARUP for the period necessary to provide you with the Real Play Coalition services.</p> <p>For further information, please see section 9</p>
10.	Updates to this Privacy Policy	<p>We may modify or update this Privacy Policy, including in order to comply with applicable law.</p> <p>Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy</p>

		Policy was last revised.
11.	How can I contact you with regard to the processing of my personal data?	You can contact us at the following email address info@realplaycoalition.com .

1. WHAT AND WHO THIS PRIVACY POLICY COVERS

DISNEY, IKEA, LEGO and ARUP are the joint controllers of the personal data (e.g. information that identifies a specific person, such as full name or email address) we collect from and about you through the Website that is processed in compliance with the terms of this Privacy Policy.

This Privacy Policy and our Cookie Policy apply to all the Website's users, including both those who navigate the Website without being registered or logged-in and those who have registered to the Website or logged-in the personal account.

2. WHAT TYPE OF PERSONAL DATA DO WE COLLECT ABOUT YOU?

The Real Play Coalition collects (1) registration data, when you create your account on the Website or join Real Play Coalition's programs, contests and events, (2) public data and posts that you share on the Real Play Coalition, our activities and initiatives, (3) data that you have permitted social media to share with this Website and the Real Play Coalition, and (4) activity data when you access, navigate or otherwise interact with the Website. More specifically, we collect the following types of data from and about you:

1. **Registration data** is the information you submit to register to the Real Play Coalition and create your personal account on the Website. Registration Information includes name, surname, email address, organization name, job title and how you heard about us.
2. **Public data and Posts** which consist of comments or content that you post on the Real Play Coalition and the personal data about you that accompanies those posts or content, which may include a name, user name, comments, likes, status, profile information and picture. Public information and Posts are always public, which means they are available to everyone and may be displayed in search results on external search engines.
3. **Activity Data.** When you access, navigate and interact with the Website, we collect certain information about those visits. For example, in order to permit your navigation, our servers receive and record information about your computer, device, and browser, including potentially your IP address, browser type, and other software or hardware information. If you access the Website from a mobile or other device, we may collect a unique device identifier assigned to that device, geolocation data, or other transactional information for that device. Cookies and other tracking technologies (such as browser cookies, pixels, beacons) are also used to collect and store information about your usage of the Website such as pages you have visited, content you have viewed and search queries you have run. For more information please visit our Cookie Policy [\[https://realplaycoalition.com/wp-content/uploads/2022/06/rpc_cookies_policy.pdf\]](https://realplaycoalition.com/wp-content/uploads/2022/06/rpc_cookies_policy.pdf).
4. **Information from Other Sources.** We may supplement the information we collect with information from other sources, such as publicly available information from social media services and commercially available sources.

In any case, we **do not** collect sensitive information. We kindly ask that you do not send us, and you do not disclose nor share, any sensitive personal data (such as social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through the Website or otherwise.

Linked Services. The Website may also be linked to sites, including social media sites, operated by unaffiliated companies, and may carry advertisements or offer content, functionality, games, newsletters, contests or sweepstakes, or applications developed and maintained by unaffiliated companies. The Real Play Coalition is not responsible for the privacy practices of unaffiliated companies, and once you leave the Website or click an advertisement you should check the applicable privacy policy of the that other service.

3. WHY DO WE COLLECT YOUR PERSONAL DATA?

We use the personal data we collect from and about you to:

- a) To provide the services available through the Website (including the management of the registration process and access to the account, account management, etc.), also allowing you to register to the Website and create your personal account;
- b) To fulfil your requests and respond to your inquiries;
- c) Measure and improve the Website as well as the Real Play Coalitions' activities and initiatives;
- d) Improve your experience both online and off-line by delivering content you will find relevant and interesting;
- e) Allow you to comment on content, and participate in online games, contests, or other initiatives, as well as join any engagement program promoted by the Real Play Coalition;

(the purposes from letter a) to letter e) above are jointly referred to as "**Contractual Purposes**");

- f) Comply with the law or legal obligation and/or to respond to requests from public and government authorities (hereinafter, "**Law Purposes**");
- g) Permit the technical management of the Website and its operational functions, including solving any technical problems, the performance of tests, updates and upgrades that cannot be carried out through non-personal data;
- h) Protect the rights of the Real Play Coalition and others: more specifically, when we use your personal data in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of the Real Play Coalition, our company affiliates or our employees, agents, contractors, licensors and suppliers (including enforcement of our agreements and our terms of use); (ii) protect the safety, privacy, and security of users of the Website; or (iii) protect the Real Play Coalition and its members, as well as other third parties involved, such as our suppliers, against fraud or for risk management purposes;
- i) Complete a corporate transaction, such as a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). For example if DISNEY, IKEA, LEGO and ARUP are involved in a merger or transfer of all or a material part of their business, DISNEY, IKEA, LEGO and ARUP may respectively transfer your information to the party or parties involved in the transaction as part of that transaction

(the purposes from letter g) to letter j) above are jointly referred to as "**Legitimate Interest Purposes**");

- j) With your prior consent, send you email communications regarding the Real Play Coalition's events, news, projects and other initiatives, as well as regarding co-branded services or features, such as contests or other promotions offered with a third-party partner (hereinafter, "**Marketing Purposes**");

We may use anonymized personal data or information that no longer identifies you personally, even indirectly (e.g. statistics), for additional purposes or share it with third parties.

4. ON WHAT LEGAL BASES DO WE PROCESS YOUR PERSONAL DATA?

The processing of your personal data for the:

- Contractual Purposes is necessary for the provision of the Website as well the Real Play Coalition's services and, therefore, it is mandatory since otherwise the Real Play Coalition's services could not be provided;
- Law Purposes is mandatory, as it is required to comply with a legal provision under applicable laws; and
- Legitimate Interest Purposes is performed on the basis of the legitimate interest of the Real Play Coalition and of its counterparties to perform the activities described above, which is adequately

balanced with your interest since the data processing is performed within the limits strictly necessary to perform such activities. This data processing activity is not mandatory and you can object at any time by contacting us at the email address in Section 11 of this Privacy Policy.

On the contrary, the processing for the:

- Marketing Purposes is discretionary, but without your consent, it is impossible to send you generic email communications regarding the Real Play Coalition's events, news, projects and other initiatives, as well as co-branded services or features; and

You can revoke your consent to the processing of your personal data for the Marketing Purposes, at any time by sending a communication to the e-mail address of Section 11 below or select the unsubscribe link contained within any email communication.

5. HOW DO WE PROCESS YOUR PERSONAL DATA?

With regard to the above mentioned purposes, the data is processed through both electronic and manual means, and is protected through adequate security measures, taking into account the state of art, the costs of implementation and the nature, scope, context and purpose of processing as well as the risk of varying likelihood and severity for the rights and freedoms of individuals. In this regard, we use appropriate administrative, technical, personnel and physical measures to safeguard personal data in our possession against loss, theft and unauthorized use, disclosure or modification.

6. WHO HAS ACCESS TO YOUR PERSONAL DATA?

For the purposes as per Section 3 of this Privacy Policy, we may share your personal data with the following categories of recipients located within the European Union or outside of the European Union in compliance and within the limits of the provisions of Section 7 below:

Third party service providers entrusted with processing activities and duly appointed as processors when required by applicable laws, including cloud service providers, other entities of the Real Play Coalition members' group, providers of services instrumental to or supporting the Website and the Real Play Coalition's services - and thus, by way of example and without limitation, companies that provide IT services, experts, consultants and lawyers.

Companies resulting from corporate transactions, such as from possible mergers, demergers, or other transformations.

Business partners, in case you adhere to co-branded services or features, such as contests or other promotions offered with or hosted by a Real Play Coalition's third-party partner.

Competent national authorities in order to comply with applicable laws or respond to authorities' requests.

7. IS YOUR PERSONAL DATA TRANSFERRED ABROAD?

Your personal data may be transferred to countries within and outside the European Economic Area, in particular to the United States. Some non EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. The full list of these countries is available at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm. For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place appropriate and suitable safeguards designed to protect your personal data and the transfer of your personal data in compliance with applicable data protection laws, such as standard contractual clauses adopted by the European Commission as per Articles 45 and 46 of the EU General Data Protection Regulation 2016/679 (the "GDPR").

You have the right to request a copy of the above measure or further information on your personal data by contacting us at the address indicated in Section 11 of this Privacy Policy.

8. WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA?

According to the GDPR, you have the right, in any given time, to:

- a) obtain confirmation as to whether or not your personal data exists. to receive a copy of it and to be informed of its content, source, as well as of further information, also available in this Privacy Policy, on the purposes of processing of your personal data, the categories its recipients, the existence of any automated decision-making, if any, the envisaged period for which we will store it, where possible, as well as the safeguards we have adopted for transfers outside the EEA;
- b) verify the accuracy of your personal data and request its rectification, update or amendment;
- c) request the deletion or anonymisation of your personal data where:
 - Your personal data are processed in breach of the applicable law;
 - Your personal data are no longer necessary for the purposes for which we have collected it;
 - We have a legal obligation to erase it;
 - You have objected to the processing justified on the legitimate interest according to point d) below and we have no overriding and compelling legitimate grounds to continue such processing;
- d) Object for legitimate reasons to the processing of your personal data on the basis of our legitimate interest;
- e) Request that we limit the processing of your personal data where:
 - You contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
 - The processing is unlawful but you do not want us to erase the data;
 - We no longer need the personal data for the purposes of the processing, but you require it for the establishment, exercise or defense of legal claims; or
 - You have objected to the processing justified on our legitimate interest pending verification as to whether we have compelling legitimate grounds to continue the processing.
- f) receive an electronic copy of your personal data, if you would like to port your personal data, when the personal data is processed by automatic means and the processing is either (i) based upon your consent or (ii) necessary for the performance of our services ("right to data portability");
- g) lodge a complaint with the relevant supervisory authority.

In this regard, you may send your request to the address provided for in Section 11 of this Privacy Policy. In your request, please include your email address, name, address, and telephone number and specify clearly what information you would like to access, change, update, or delete.

Remember that even after you cancel your account, or if you ask us to delete your personal data, copies of some information from your account may remain viewable in some circumstances where you have shared information with social media or other services or retention of such copies is necessary to comply with legal obligations or to exercise our rights or the legal defense.

With specific reference to the Marketing Purposes, if you no longer want to receive our emails, you may opt-out of receiving these emails by following the unsubscribe instructions in our communications. You may also send a request to the address of Section 11 of the Privacy Policy. In any case, the Real Play Coalition may continue to send you administrative communications related to the provision of its services.

In all the above cases, we may contact you and ask you for more information, that is necessary to properly handle your request.

9. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your data only for the period necessary to fulfill the purposes for which the data was collected as outlined in this Privacy Policy. In any case, the following retention periods will apply to the processing of your personal data for the purposes indicated below:

- Data collected for the Contractual Purposes and the Legitimate Interest Purposes is retained for the time of provision of services through the Website plus the length of any applicable statutory limitation period following the termination of the services;
- Personal data processed for Law Purposes is stored for the period strictly necessary to comply with applicable laws; and
- Data collected for the Marketing and Profiling Purposes is retained for 12 months from the last interaction with you (e.g. request, subscription to an initiative, participation to an event, opening of a newsletter, etc.), notwithstanding the right to withdraw the consent provided or object to the processing at any time. Should you decide to opt-out from receiving such communications, please note that we will be required to retain limited data in order for us to respect your opt-out and ensure that you do not receive email communications anymore.

At the end of the retention period, your personal data will be either cancelled, anonymized or aggregated.

10. UPDATE TO THIS PRIVACY POLICY

We may modify or update this Privacy Policy for any reason (including, but not limited to, changes in applicable law and interpretations, decisions, opinions and orders relating to such applicable law). Please look at the Effective Date at the top of this Privacy Policy to see when it was last revised. Any changes to this Privacy Policy will be provided in advance by posting the revised Privacy Policy on the Website. If we make material changes to this Privacy Policy that change the nature of processing or expand our rights to use the personal data we have already collected from you, we will notify you in advance and provide you with a choice about our future use of the personal data, as may be required by applicable law.

11. CONTACT US

If you have questions about this Privacy Policy, please contact the Real Play Coalition at the following email address info@realplaycoalition.com.