

PRIVACY POLICY D. CLOOSTERMANS-HUWAERT

[version – August 2022]

D. Cloostermans – Huwaert N.V. (hereafter identified as “**Cloostermans**” or “**we**”) appreciates your interest in our website and company. It is important to us that you know how we collect, process and store your personal data. We strive to do this with respect for your rights and, of course, in compliance with the applicable regulations. We therefore want you to be informed about your rights and to know what we do with your personal data. If you have any questions about the processing of your personal data, please contact us at the following email address info@cloostermans.com.

This Privacy Policy may be amended, for example as a result of new legal, contractual or administrative obligations, new activities or ambitions. We therefore recommend that you consult this Privacy Policy regularly. Important changes will be communicated in each case. This version of the Privacy Policy was last amended in August 2022.

WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

D. Cloostermans – Huwaert N.V. is the party responsible for processing your personal data, also known as the data controller. D. Cloostermans – Huwaert N.V. is a company incorporated under Belgian law, with registered office at Kanunnik De Meyerlaan 23, 9220 Hamme (Belgium) and is registered with the Belgian Crossroads Bank for Enterprises (“CBE”) under the number 0406.873.923.

The Privacy Policy is only applicable to the processing of personal data within the framework of Cloostermans’ activities and to the extent that no other specific privacy policy applies.

This Privacy Policy applies to the website www.cloostermans.com and to all (commercial) relationships between Cloostermans and its customers, prospects and business partners. This Privacy Policy relates to marketing, including visiting the website or other applications, the organization of business or marketing events, all forms of information provision via newsletters, articles on the website or via social media, and (customer) relationship management.

This Privacy Policy describes, among other things, the types of personal data we collect about you, where we obtain the personal data from, how we use the personal data we collect about you, how long we retain your personal data, to whom we may provide this information, and your rights with regard to the processing of your personal data.

If you do not want us to process your personal data, you must not use this website or you must not submit information to us through or in connection with this website.

WHAT IS PERSONAL DATA?

Personal data is any data relating to identified or identifiable natural persons.

An 'identifiable' person is one who can be identified, directly or indirectly, by means of a number or by one or more specific elements characteristic of his or her physical, physiological, psychological, economic, cultural or social identity.

WHAT PERSONAL DATA DO WE COLLECT FROM YOU?

Cloostermans may process the following personal data to the extent, and if, relevant for the purposes referred to in this Privacy Policy:

- **Identification details**

First name and surname, gender, date of birth, company, position

- **Contact details**

Address, email address, telephone number, possibly other contact details.

- **Company data or data related to your professional activity**

Activity, turnover, number of employees, directors, management, shareholders, VAT/CBE registration number, position or professional activity, company name or name of the activity.

- **Professional and business interests**

Services or products from Cloostermans which are or could be of interest to you or your company. The preferences shown from your visit to our websites or applications, as well as preferences or interests shown by your participation in business or marketing events, but, of course, also from interests that you yourself have indicated

- **Opinions about our products and services**

We process your opinions relating to our products, services and information when they are relevant in a professional context, or in order to provide you with even more targeted information.

- **Online data**

This includes data from visits to our websites or other applications, and your surfing behaviour or other online contacts, but also data that we process based on your social media use in a professional context, such as likes, comments or similar.

In principle, we do not process sensitive personal data about you. If this data is actually processed, this is purely for the purpose of general data processing and never with the intention of using this particular data. In principle, we only process personal data relevant in a professional context.

Our website and/or our services do not intend to collect information about persons under the age of 13, unless they have parental or guardian consent or we are bound by our legal obligations. However, we cannot verify whether a website visitor is over 13 years of age. We encourage parents to be involved in their children's online activities in order to prevent the collection of information about children without parental consent.

If you believe that we have collected personal information about a minor without this consent, please contact us (see contact details).

You are in principle not obliged to provide us with your personal data. However, in certain instances, we may not be able to fulfil your request, provide you with information or enter into an agreement with you if you do not provide us with your personal data.

HOW IS THIS PERSONAL DATA COLLECTED?

Your personal data is usually collected when you decide to provide it to us or to our employees. This can occur in the following situations, among others:

- Visiting Cloostermans' website(s) or using other Cloostermans applications
- Your interest in Cloostermans' products or services
- When subscribing to a Cloostermans' newsletter
- When connecting to professional social media channels with Cloostermans or its employees
- When participating in business or marketing events organised by Cloostermans
- From correspondence or contacts with Cloostermans.

We can also supplement your profile with data from our CRM and ERP systems or other internal sources of information.

Cloostermans may also receive your personal data via other sources of information that are publicly accessible, such as the Belgisch Staatsblad/Moniteur Belge, your own website or profile, the National Bank of Belgium, the Belgian Crossroads Bank for Enterprises.

Exceptionally, we may obtain information from other databases or sources of information. Before we do so, we check with the providers of these databases or sources to ensure that they comply with the applicable data protection regulations.

We use both paper and digital documents and forms for the collection of data.

THE LEGAL BASIS ON WHICH PERSONAL DATA IS COLLECTED

Here we set out the basis upon which we process your personal data. Please note that we may process personal data for more than one lawful basis, depending on the specific purpose for which we are using that information:

- Your consent: personal data will be processed after you have given your consent.
- Compliance with legal obligations: personal data must be processed in order for Cloostermans to comply with its legal obligations.
- Performance of the contract: the personal details that are processed are necessary for the performance of a contract existing between you and Cloostermans.
- Legitimate interest: personal data may be processed if this is in the legitimate interest of Cloostermans as a company, provided that your personal interests do not outweigh our interests.

THE PURPOSES FOR WHICH PERSONAL DATA IS PROCESSED

Personal data is processed for:

- The performance of the contract between you and Cloostermans
- The request for information or an offer
- The improvement of our services
- Direct marketing activities; if you do not want your data to be used for these purposes, you can always adapt this via a notification, as well as via your cookie settings.
- The optimisation and analysis of the quality, the management and the content of Cloostermans' website(s) or other applications
- The optimisation of our relationship with you
- Carrying out customer satisfaction studies, surveys and other market studies
- The organisation or facilitation of business or marketing events
- For the protection of our legitimate business interests
- To inform you about changes or expansion of our services and products
- The execution of a legal obligation.

The way in which your personal data are processed may vary depending on the service(s) Cloostermans provides to you.

WITH WHOM IS YOUR PERSONAL DATA SHARED?

Your data will only be used within Cloostermans, by our employees, consultants and directors. Apart from the exceptions mentioned below, your data will, in principle, not be shared with third parties.

- Your data may be shared with third parties if you have given your explicit consent to it.
- Your information will be shared with third parties if this is necessary for the performance of our activities, such as service providers. Cloostermans only cooperates with reputable partners who comply with the applicable regulations and provide the necessary security measures for the protection of your personal data.
- Your details will be shared with third parties if this is necessary for the performance of the contract with Cloostermans, or to provide you with more targeted information.

- Your data can be shared with logistics partners to organize mailings or to organise business or marketing events.
- Your details may be shared with third parties if Cloostermans is legally obliged to do so (e.g. the government, the tax administration).
- In the event of re-organisations or the sale of Cloostermans to another organization, Cloostermans may disclose personal data in connection with the sale or other transfer of the company to which the data relates. In that case, Cloostermans will inform the acquiring party of their obligations under the applicable regulations.

Under no circumstances will your personal data be shared with third parties for purely commercial purposes.

We enter into a data processing agreement with the companies/persons who process your data on our behalf in order to ensure the same level of security and confidentiality of your data.

In principle all personal data are stored within the EU. When we would transfer data outside the EU or to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of data outside the EU.

HOW IS YOUR PERSONAL DATA SECURED?

Cloostermans takes all reasonable and appropriate security measures to secure your personal data, at both a technical and organizational level, as well as at an administrative level. In doing so, we take into account the state of the art, the implementation costs, the nature, scope and context of the processing and the probabilities and seriousness of the potential risks as identified by us. In this way, unauthorized access, unwanted destruction, loss or modification of data and data leaks are avoided as much as possible. Our systems are continuously monitored and improved so that security can be guaranteed. Nevertheless, no system or procedure can completely exclude the above-mentioned risks.

HOW LONG WILL YOUR DATA BE STORED?

In accordance with data protection legislation, your personal data will not be kept longer than necessary for the purpose for which it has been processed. Cloostermans is obliged by the applicable regulations to retain some personal data for a minimum period of time. For this purpose Cloostermans takes into account the applicable legal retention obligations.

WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA?

- **Right of access**

You have the right to receive confirmation that we process personal data from you, and you have the right to request access to your personal data. Before Cloostermans grants you access to the details, it may ask you for proof of identification.

You can request a free copy of the personal data that Cloostermans processes of you. If you wish additional copies or if you wish to inspect them repeatedly, Cloostermans may charge a fee for this due to its administrative costs.

- **Right to rectification**

You have the right to have your personal data corrected free of charge if it is incorrect or incomplete.

- **Right to revoke your consent**

If the processing is based on your consent, you may revoke this consent at any time. This shall not affect the lawfulness of the processing based on your consent prior to its withdrawal, however.

- **Right of erasure**

In the following cases, you can request the deletion of your personal data free of charge:

- The personal data is no longer necessary for the purposes for which it was collected and/or processed
- You revoke your consent and there is no other legal basis for processing the personal data
- The personal data has been processed unlawfully
- The personal data must be deleted in order to comply with a legal obligation incumbent on Cloostermans.
- You object to the processing and there are no overriding compelling legitimate grounds, or
- In case of direct marketing, you have the right to erase your personal data at any time;

The consequence of such a removal may well be that certain Cloostermans services can no longer be provided.

- **Right to restriction of processing**

You have the right to block or limit the processing of your personal data if:

- You dispute the accuracy of the personal data (during the period that allows Cloostermans to verify the accuracy of the data)
- The processing is unlawful and you oppose the deletion of the data, but insist on a limitation of the processing
- The data is no longer required for processing purposes, but you need it for legal proceedings
- you have objected to the processing, pending clarification, or if Cloostermans' legitimate interests outweigh your interests.

If data processing is restricted, Cloostermans may store the personal data, but may not further process them.

- **Right to object**

You have the right to object:

- Against the processing of data, unless Cloostermans invokes compelling legitimate grounds that would outweigh your interests, rights and freedoms, or which are related to a legal action;
- At all times against processing for direct marketing;

- **Right to data portability**

If the processing is based on your consent, or on an agreement with Cloostermans, and the processing is carried out using an automatic process, you have the right to obtain your personal data in a structured, commonly used and machine readable format. In such a case, you also have the right to transfer the data in that format to another data processor. If the processing is based on a legal basis other than your consent or your agreement with Cloostermans, the right of transferability does not apply, without prejudice to your other rights.

- **Right to complain**

Cloostermans strives to process your personal data as transparently and correctly as possible. If you still feel that something is wrong, you can always contact us via the e-mail address: info@cloostermans.com.

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work or place of alleged

infringement. For Belgium, the supervisory authority is the Belgian Data Protection Authority:

- Drukpersstraat 35 - 1000 Brussels
- Telephone: 02/274.48.00
- Fax: 02/274.48.35
- E-mail: contact@apd-gba.be
- www.gegevensbeschermingsautoriteit.be

HOW CAN YOU EXERCISE YOUR RIGHTS?

If you wish to exercise one of your above-mentioned rights, you can send your request by registered letter to D. Cloostermans – Huwaert N.V., Kanunnik De Meyerlaan 23, 9220 Hamme, or by e-mail to info@cloostermans.com.



Cookie scan report

Summary

Scan date: 04/08/2022
Domain name: www.cloostermans.com
Server location: Belgium
Cookies, in total: 0

Scan result

0 cookies were identified.



The result is based on a scan of up to 5 website pages and therefore not complete. To perform a complete scan, create a [Cookiebot subscription for your domain](#).