

**Appendix 1 to Van Bricht General Terms And Conditions V1 – Privacy Policy**

<b>Privacy Policy</b>
<b>1. Scope</b>
This Privacy Policy contains VAN BRICHT’s terms in respect of processing of data (hereafter “Privacy Terms”). Capitalised terms used have the meaning set forth below. These Privacy Terms apply to You as customers and any visitor of the Website and relates to any processing of your personal data that takes place through the Website or through communications or exchanges with VAN BRICHT (whether within or outside the context of the Purchase). We reserve the right to amend these Privacy Terms and will notify you thereof. Article 1.4. of the General Terms and Conditions also applies to such changes. The processing of personal data on VAN BRICHT’s network or via communications with VAN BRICHT is also subject to the provisions of the General Data Protection Regulation (GDPR) <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&amp;from=NL">https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&amp;from=NL</a> Terms related to GDPR shall have the meaning as defined in the GDPR.
<b>2. Entity responsible for processing your personal data.</b>
VAN BRICHT is, when it collects and processes your personal data, the controller for the processing of this data.
<b>3. Data being processed.</b>
The following personal data may be collected, processed and stored by VAN BRICHT in the following instances:
<b>a. Visit of the Website</b>
In the event You would visit the Website, the following directly or non-directly identifying personal data may be collected, processed and stored by VAN BRICHT:
<ul style="list-style-type: none"> <li>Information concerning the pages You have consulted on the Website and the activities You have performed via the Website (click-history, navigation and browser history)</li> <li>Certain non-directly identifying data, such as the type of browser You are using, the operating system You are using or your IP address or the technologies with which You have accessed our Website</li> <li>Identification information You have given us voluntarily (for example by subscribing to newsletters)</li> </ul>
<b>b. Online purchase order</b>
In the event You would make an online purchase order on the Website, the following directly or non-directly identifying personal data may be collected, processed and stored by VAN BRICHT:
<ul style="list-style-type: none"> <li>Your surname and first name</li> <li>Your address</li> <li>A copy of your identification card or passport</li> <li>Your phone number</li> <li>Your email address</li> <li>Products ordered</li> <li>Delivery method and delivery address</li> <li>Payment method and payment status</li> <li>If applicable, company name and VAT number</li> <li>In the event You would have created a client account, your account information (passwords will be hashed)</li> </ul>
<b>c. Creation of client account</b>
In the event You would create a client account, the following directly or non-directly identifying personal data may be collected, processed and stored by VAN BRICHT:

<ul style="list-style-type: none"> <li>Your surname and first name</li> </ul>
<ul style="list-style-type: none"> <li>Your address</li> </ul>
<ul style="list-style-type: none"> <li>Your phone number</li> </ul>
<ul style="list-style-type: none"> <li>Your email address</li> </ul>
<ul style="list-style-type: none"> <li>If applicable, company name and VAT number</li> </ul>
<p><b>d. Contact with customer services</b></p>
<p>In the event You would contact VAN BRICHT’s customer services, VAN BRICHT may collect, process and store all personal data You have provided VAN BRICHT with, including:</p>
<ul style="list-style-type: none"> <li>Your name and surname</li> </ul>
<ul style="list-style-type: none"> <li>Your phone number</li> </ul>
<ul style="list-style-type: none"> <li>Your email address</li> </ul>
<ul style="list-style-type: none"> <li>Your address</li> </ul>
<ul style="list-style-type: none"> <li>If applicable, Your company name</li> </ul>
<p><b>4. Purposes of the processing.</b></p>
<p>VAN BRICHT can process your personal data for (one of) the following purposes, based on one or more legal grounds:</p>
<p><b>a. To improve your experience visiting the website</b></p>
<p>The personal data under 3.a and, in the event you would have created a client account, the personal data under 3.c may be processed to ensure the good functioning of the Website to enhance the use of the Website. VAN BRICHT processes this data based on the legitimate interest it has in providing a good functioning Website and services</p>
<p><b>b. To ensure the execution of your online purchase order</b></p>
<p>The personal data under 3.b and, in the event you would have created a client account, the personal data under 3.c will be used to execute your online purchase orders by, amongst other things, managing your orders, process take backs, sending notifications on the status of delivery, manage payments and deal with complaints or guarantee related questions. This personal data will also be used for your identification, validating You have the legally required age of 18 years and to confirm your address with external partners. VAN BRICHT processes this data based on the legitimate interest it has in providing its services in compliance with the agreed to conditions and legal obligations.</p>
<p><b>c. To manage your client account</b></p>
<p>The personal data under 3.c will be used to create and manage your personal account in order to provide you with a personal and relevant experience on VAN BRICHT’s website. VAN BRICHT will enable you to manage your account settings and provide you with the means to keep your personal data (such as contact information and payment information) accurate and up-to-date. VAN BRICHT processes this personal data based on your explicit consent.</p>
<p><b>d. To answer your questions to our customer services</b></p>
<p>VAN BRICHT processes the data under 3.d based on your explicit consent in order to manage your questions and deal with your complaints or guarantee related requests by e-mail, telephone or social media.</p>
<p><b>e. To inform You about our events, about developments related to subjects that might be of interest to You and about our sales and promotions, or for direct marketing purposes</b></p>
<p>VAN BRICHT processes the data under 3 based on your explicit consent and VAN BRICHT’s legitimate interest to keep its clients informed of its activities and sales.</p>
<p><b>5. Third party access to your personal data</b></p>
<p>VAN BRICHT may rely on the services provided by third parties to perform certain (processing) activities.</p>

<p>VAN BRICHT uses in the context of its activities servers that are rented by a third party and that are located at the premises of this third party. This third party has no access to the data hosted on these servers.</p>
<p>VAN BRICHT may, upon your request and with your consent, transfer your personal data under 3.c to third parties in the context of the integration of your client account with other IT-applications. In this case you will be requested via appropriate technical means to provide your consent with such transfer and You will conclude directly with such third party into the required data processing agreements.</p>
<p>VAN BRICHT will enter into the necessary processing agreements with these third parties (if required) and will use its best efforts to ensure that they contain similar provisions on data protection as contained in these Privacy Policy and that they guarantee the same level of security and confidentiality of your personal data.</p>
<p>VAN BRICHT does not provide any personal data to other third parties, except if required by law or by an order of a competent court of regulatory authority to do so.</p>
<p><b>6. Protection and storing of your personal data VAN BRICHT undertakes to implement the security measures, which can reasonably be expected in order to protect your personal data from destruction, loss, modification or any other unauthorised processing. In particular VAN BRICHT will amongst others implement the following security measures:</b></p>
<p>A) Technical security measures</p>
<ul style="list-style-type: none"><li>• User data is stored on a server with no public IP address. Only specific servers are able to contact this server in a separate private network;</li></ul>
<ul style="list-style-type: none"><li>• The webserver are located in a network which is protected by a firewall;</li></ul>
<ul style="list-style-type: none"><li>• User passwords are always hashed (not stored in plain text); and</li></ul>
<ul style="list-style-type: none"><li>• User data is stored in a database with access control (login and password).</li></ul>
<p>B) Operational security measures</p>
<ul style="list-style-type: none"><li>• Access to user data is restricted to certain team members and can be revoked at any time.</li></ul>
<p>VAN BRICHT will not store any of your personal data any longer than is necessary for the specific purposes for which it is stored, taking into account VAN BRICHT’s contractual and legal obligations with regard to this data and VAN BRICHT’s mission to correctly answer customer questions and to ensure it complies with its legal and contractual obligations in respect of the sale of goods.</p>
<p><b>7. Exercise of personal rights related to your personal data</b></p>
<p>You have the following rights in respect of your personal data being processed by VAN BRICHT:</p>
<ul style="list-style-type: none"><li>• the right to request free access to the personal data processed;</li></ul>
<ul style="list-style-type: none"><li>• the right to request the correction or removal of your data;</li></ul>
<ul style="list-style-type: none"><li>• the right to request a restriction of the processing;</li></ul>
<ul style="list-style-type: none"><li>• the right to request the portability of your data; and</li></ul>
<ul style="list-style-type: none"><li>• the right to object to the processing of your personal data (in the case of direct marketing without any substantiation).</li></ul>
<p>In case the processing of your personal data is based on your consent, You have the right to revoke this consent at any time. However, such a revocation does not affect the lawfulness of any processing prior to this revocation.</p>
<p>If You intend to use any of your abovementioned rights, please do so by directing your request to <a href="mailto:info@vanbricht.com">info@vanbricht.com</a> or by a letter to VAN BRICHT (see address below). We cannot handle your request without proof of your identity and the applicable legislation may impose conditions on exercising the above rights.</p>
<p>VAN BRICHT will request a copy of your identification document as proof that You are indeed concerned by the personal data and thus entitled to rights mentioned above. VAN BRICHT will use its best efforts to respond to your request without undue delay after receipt of your request.</p>

You should bear in mind that VAN BRICHT will not always be obliged to comply with your request for access, correction, removal or transfer. This is because of our legal obligations, for the establishment, exercise or substantiation of a legal claim or the legitimate exercise of the right of freedom of expression and / or information.

You also have the right to file a complaint with the Data Protection Authority. Such a complaint can be filed either by post directed at Rue de la Presse 35, 1000 Brussels or through an e-mail to [contact@apd-gba.be](mailto:contact@apd-gba.be)

## 8. Cookies

VAN BRICHT may use “cookies” when You visit the Website. A cookie is information sent from a web-server to your web-browser, and which is placed on your hard-drive. Cookies permit our website to recognize future visits using your computer. Cookies enhance the convenience and use of our website. You may choose to decline cookies if your browser permits, but doing so may affect your use of the Website and your ability to access or use certain web features. We will use the follow cookies:

### A) Functional cookies

Provider uses functional cookies, which save the session-ID as well as the information consulted during the session. They are necessary to ensure the adequate functioning of our website. These cookies make sure You will be timely and correctly provided with the information desired each time You will visit the Website. We do not request Your consent for using these functional cookies. The information gathered through these functional cookies shall not be passed on to any third party.

### B) Analytical cookies

Analytical cookies, the `_ga` and `_gid` cookies of Google Analytics, enable Provider to analyse the use that is being made of the Website. They allow us, for example, to register how frequently the Website is being visited by different visitors, through which pages users access the Website and which pages of the Website are visited most. The device You use to visit the Website, is accorded a randomly generated identification number, which is used by Google's servers to compute the statistics. Google will not use the generated identification number for its own purposes and will not link it to other data in its possession. Provider shall not install tracking cookies without requesting Your prior consent.

### C) Tracking cookies

Tracking cookies allow Provider to monitor your online activities on the Website. They enable Providers and advertisers to provide You with personalized online advertisements and tailor-made content based on your online activities on the Website. Provider shall not install tracking cookies without requesting Your prior consent.

### D) Social media plug-in cookies

Social media plug-in cookies are used to enable Provider to display content of social media on the Website or the other way around. Provider shall not install social media cookies without requesting Your prior consent. Please consult the applicable cookie and privacy policies and settings of the respective social media providers you give consent to.

## 9. Contact details

Should You have any questions in respect of this Privacy Policy, please contact: Bernies SCR operating for this matter under the trading name Van Bricht

1, rue du Cimetière  
5560 Hulsonniaux (Houyet) Belgium

E-mail: [info@vanbricht.com](mailto:info@vanbricht.com) Company registration number BE 0683.609.181

## 10. Defined terms

Privacy Terms	means VAN BRICHT's terms in respect of processing of data;
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Website	means the website <a href="http://www.vanbricht.com">www.vanbricht.com</a> and any other websites, including the webshop (if any) and sub-domains, owned or operated by VAN BRICHT from time to time;
You	means any natural or legal person, either a consumer or an undertaking, who uses the Website and/or places an online purchase order;