

# PRIVACY STATEMENT

## 1. INTRODUCTION

This is the ERIKS Privacy Statement for customer, supplier and business partner data. This Privacy Statement provides information on the processing of personal data by ERIKS N.V. and its group companies (a) present in the countries specified on this page: <https://eriks.com/en/our-locations/> and (b) by ERIKS Digital B.V. (hereafter ERIKS, we or us).

The primary purpose of this Privacy Statement is to be a dynamic resource and business tool so that we can offer our services to you in the best possible way. We want you to feel secure when visiting our websites and are committed to maintaining your privacy when doing so.

This Privacy Statement may be changed over time. The most up-to-date Privacy Statement is published on our website. This Privacy Statement was last changed on 25 March 2019.

## 2. WHEN DOES THIS PRIVACY STATEMENT APPLY?

This Privacy Statement is applicable to the processing by ERIKS of all personal data of its customers, suppliers and business partners and other individuals. This Privacy Statement does not address the processing of personal data of employees in the context of their employment relationship with ERIKS.

## 3. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Each of the ERIKS group companies specified on this page <https://eriks.com/en/our-locations/> and Eriks Digital are joint controllers of the processing of all personal data that fall within the scope of this Privacy Statement. This Privacy Statement indicates what personal data are processed by ERIKS and for what purpose, and to which persons or entities the data will or may be provided. ERIKS may share your personal data with third parties.

## 4. FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

### 4.1 When you interact with ERIKS(online or offline)

#### (a) For answering your questions

- (i) **What does this purpose entail?** If you get in touch with us at [info@eriks.be](mailto:info@eriks.be) or via the contact form on one of the ERIKS group websites (each a **Website**), we will use your personal data in order to reply to and answer your question.
- (ii) **On what legal ground do we process personal data for this purpose?** We process your information for this purpose based on our legitimate interest to adequately answer your questions.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your name, contact details, your correspondence with ERIKS about your question and all other personal data which are necessary to answer your question.
- (iv) **For what period do we retain your personal data for this purpose?** If you have contacted us via the contact form on ERIKS support page, then your data will be deleted from our

systems after 1 year after fulfilling the purpose of your enquiry, except in the situations specified below. If you have contacted us via info@eriks.be then your data will be retained for the same period.

**(b) For the development and improvement of products and/or services**

- (i) **What does this purpose entail?** We process your personal data in order to assess, analyse and improve our products and (customer) services. We use aggregated personal data to analyse customer behaviour and to adjust our products and services accordingly. When you use a Website, enter or search data through this Website; we also process your personal data to compile analytics reports. We use aggregated personal data to analyse customer behaviour and to adjust our products and services accordingly, to ensure that it is relevant to our customers. This means that we analyse how often you read our newsletters, how often you visit our Website, which pages you click on and what goods you purchase through our Website.

Based on the information above, we can make adjustments to our offering, our newsletters or our Website. We may also adapt our promotions on the basis of our analysis. We may also perform research into market trends through statistical analysis to evaluate and adapt our products and marketing to new developments, but research results are only reported on an aggregated basis.

- (ii) **On what legal ground do we process personal data for this purpose?** We process your information based on our legitimate interest to develop and improve our products and services.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your contact details such as your address and email address, personal details such as your name and date of birth, payment and credit information, and correspondence with us. In addition, we process the personal data you entered into a Website or that were generated by the functionalities you used in a Website and the technical data from your device such as its IP-address, the pages you visited on our Websites, your click- and surf behaviour which we collect through cookies and other similar techniques and the length of your session.
- (iv) **For what period do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for 5 years. After this term, your personal data will be deleted from our systems.

**4.2 When you use our Websites**

**(a) To deliver you our Website's functionalities and for their technical and functional management**

- (i) **What does this purpose entail?** If you use our Website, we process technical data to offer you our Website's functionalities and to allow our Website's administrators to manage and improve our Website's performance. If you enter data in our Websites, such as a product preference or your location to receive relevant information or functionalities, ERIKS processes this data to provide you with the requested information or functionalities. Further, we process your personal data to allow you to save your data (such as preferences and products) to your saved items and to allow you to share these with others using the sharing options you have configured on your device. ERIKS also uses cookies to ensure you can retrieve information from our Websites quickly and easily (read more about cookies in chapter 5).
- (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose based on our legitimate interest to offer technically adequately working Websites and to improve our Websites' performance.

- (iii) **Which personal data do we process for this purpose?** For this purpose, we process the personal data you have entered into our Websites or that is generated by the functionalities you have used in our Websites and the technical data from your device such as its IP address, the internet browser you use, the pages you have visited on our Websites, your click- and surf behaviour and the length of your session.
  - (iv) **How long do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for 10 years. After this term, your personal data will be deleted from our systems.
- (b) **If you open a ERIKS-account with us, or if we make an ERIKS-account for you, to administer the account(s), to process your orders, to ensure confidentiality and security of your purchases, for customer service and relationship management, and to provide you with customer-specific services through the Websites**
- (i) **What does the purpose entail?** When you choose to register on our website or with our webshop, you need to provide personal data so that we can create a personal account for you. Upon creating your account, we will send you your personal login information. We may also create an account for you. In that case we will use the personal data we already have about you to create your account. We will then send you your personal login information. These personal data enable us to administer your account and enable us to ensure the confidentiality and to maintain the security of your website visit and/or purchases. We are, for instance, able to change your password for you. We are, however, not able to view your password.
  - (ii) **Which personal data do we process for this purpose?** For this purpose, we process your name, email address, title, telephone number, address, any other information you have added to your account, your login data (including your password), display name, your role, the details of your purchases and your payment details.
  - (iii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose because this is a requirement to enter into a contract, namely the contract between you and us to open and use the account, to use the Websites and make purchases through the webshop. ERIKS shall only open an account when you provide the requested information.
  - (iv) **How long do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for the duration of the account. After this term, your personal data will be deleted from our systems
- (c) **To allow you to connect with us (eg via social media)**
- (i) **What does this purpose entail?** ERIKS is active on social media platforms like Facebook, Twitter, LinkedIn and YouTube. When you contact ERIKS via social media, we process your personal data in order to answer your questions and to respond to your messages.  
  
In addition, when you visit a 'Connect with us' screen on one of our Websites or Apps, you can contact us through a variety of communication channels. We provide you with our email address, for you to send us your feedback and suggested improvements, as well as our Website, trade website, Twitter, Facebook and YouTube details. When you click one of the corresponding icons we will refer you to the website or app of the applicable third party, whether this is your email provider or a social media platform.
  - (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose based on our legitimate interest to adequately respond to your questions and correctly refer you to our social media pages.

- (iii) **Which personal data do we process for this purpose?** For this, we process the communication channel you have chosen to use to connect with us and the personal data you supply to ERIKS. This includes your (user) name, address, email address and the personal data you have included in your message. In addition, when you click one of the buttons displayed, the relevant third party might place cookies on your device (read more about cookies in chapter 5).
- (iv) **How long do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for 5 years. After this term, your personal data will be deleted from our systems.

### 4.3 When you do business with us

#### (a) For the assessment and acceptance of a customer, supplier or business partner

- (i) **What does this purpose entail?** When you get in contact with ERIKS, we will process your personal data for assessment and acceptance purposes, for example in order to confirm and verify your identity. ERIKS will further process your personal data for other administrative purposes such as due diligence and screening against publicly available government and/or law enforcement agency sanctions lists.
- (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose because this is necessary for the conclusion of a contract between you and us. ERIKS cannot enter into contracts without obtaining the required information.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your contact details such as your address and email address, personal details such as your name and date of birth, payment and credit information and details of your correspondence with us.
- (iv) **For what period do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for 10 years. After this term, your personal data will be deleted from our systems.

#### (b) For the conclusion and execution of agreements

- (i) **What does this purpose entail?** When you have purchased a product or service from us as a customer, or when you work together with us as a supplier or business partner, we process your personal data for administrative purposes such as sending invoices and making payments. We also use your personal data in order to deliver or receive and administer our or your products or services. ERIKS will process your personal data in order to further execute our agreement, including for the delivery of customer services. When you require access to ERIKS's premises, we process your personal data for screening purposes.
- (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose because this is necessary for the conclusion of a contract between you and us. ERIKS cannot enter into contracts without obtaining the required information.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your contact details such as your address and email address, personal details such as your name and date of birth, payment and credit information, order history and other data stored in our customer, supplier and business partner database.
- (iv) **For what period do we retain your personal data for this purpose?** For this purpose, your personal data will be retained until 20 years as from your last order placed with ERIKS or, in case you have a long-term written agreement with ERIKS, 20 years as from the date of

termination of this agreement. After this term, your personal data will be deleted from our systems.

**(c) For relationship management and marketing**

- (i) **What does this purpose entail?** ERIKS uses the information stored in its customer database, which is managed by Eriks Digital, to show you suitable offers (including on third party media) and send you newsletters, as well as to provide customer services, perform account management and communicate recalls. We also use your personal data for the development, execution and analysis of market surveys and marketing strategies.
- (ii) **On what legal basis do we process personal data for this purpose?** When sending you newsletters and/or other relationship management and (direct) marketing communications, we process personal data based on your consent. In addition, we process personal data for this purpose based on our legitimate interest to improve our marketing strategies.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your contact details such as your address and email address, personal details such as your name, contact preferences, payment information, order history and correspondence with us. For this purpose, the foregoing personal data may also be combined with the following personal data: IP address, the pages you visited on our Websites, your clicking and surfing behaviour which we or third parties collect by means of cookies and other similar techniques and the duration of your session.
- (iv) **For what period do we retain your personal data for this purpose?** For this purpose, your personal data will be retained until 5 years as from your last order placed with ERIKS or, in case you have a long-term written agreement with ERIKS, 5 years as from the date of termination of this agreement. After this term, your personal data will be deleted from our systems.

**(d) For business process execution and internal management**

- (i) **What does this purpose entail?** We process your personal data in the performance and organisation of our business. This includes general management, order management and management of ERIKS assets. ERIKS also processes your personal data for its internal management. We provide central processing facilities in order to work more efficiently. We conduct audits and investigations, implement business controls, and manage and use customer, supplier and business partner directories. Also, we process your personal data for finance and accounting, archiving and insurance purposes, legal and business consulting and in the context of dispute resolution.
- (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose based on our legitimate interest to maintain and improve sound business operations.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your contact details such as your address and email address, personal details such as your name, payment and credit information, payment and order history, correspondence with ERIKS and data generated during the performance of the agreement between you and ERIKS.
- (iv) **For what period do we retain your personal data for this purpose?** For this purpose, your personal data will be retained until 5 years as from your last order placed with ERIKS or, in case you have a long-term written agreement with ERIKS, 5 years as from the date of termination of this agreement . After this term, your personal data will be deleted from our systems.

## 4.4 Your choices

### (a) If you participate in events or promotions

- (i) **What does this purpose entail?** With your consent, we can send you emails with promotions and invitations to participate in events. If you choose to participate in one of these activities, we need your personal data to be able to announce and organise these. In addition, if you participate in any of these activities, we need your personal data to measure the response to events and/or promotions.
- (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose based on your consent. You can withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before withdrawal.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process your name, address, email address and your entries in the relevant event.
- (iv) **How long do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for the duration event you participate in. After this term, the personal data processed for this purpose will be deleted from our systems.

### (b) Only if you have consented to this during your account registration, for sending or showing you relevant information about ERIKS

- (i) **What does this purpose entail?** When you register for an account on our Website, we ask you for your consent to receive personalised newsletters, information about products, services, events and promotions from ERIKS or other ERIKS group companies. If you consent thereto, we process your personal data to provide you with information you may be interested in based on your account details, our Websites pages you have visited and the data you have entered into our Websites (including your preferences), your online and offline shopping history and your registered use of ERIKS or other ERIKS websites. We will contact you through email, mail, SMS, social media and any other communication channels you have provided to us. We may also show you relevant offers on third party media.

In this way we learn about your interests and can ensure that we provide you with the information and promotions that are of most interest to you. We may also ask you for your opinion about our products and services. If you do not want to receive any more messages or if you want to opt out of receiving or seeing a particular form of communication with us (for example SMS, social media, email or regular mail), just follow the steps in that particular communication or opt out on your account page.

- (ii) **On what legal ground do we process personal data for this purpose?** We process personal data for this purpose based on your consent. You can withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before withdrawal. In addition, we process personal data for this purpose based on our legitimate interest to improve our marketing strategies.
- (iii) **Which personal data do we process for this purpose?** For this purpose, we process:
  - your name, email address, and physical address;
  - your preferences and interests, such as those that you have actively shared with us, but also those inferred through your registered interactions with ERIKS websites and apps (for which we may use cookies; read more about cookies in chapter 5);

- your shopping history, both online (if you link your purchases to your profile) and offline (when making an offline purchase);
  - the links you click on in our emails; and
  - IP address, the pages you visited on our Websites, your clicking and surfing behaviour which we or third parties collect by means of cookies and other comparable techniques and the duration of your session.
- (iv) **How long do we retain your personal data for this purpose?** For this purpose, your personal data will be retained for the duration of your account. After this term, your personal data will be deleted from our systems.

## 5. COOKIES

We and third parties also collect information through the use of cookies. Cookies are small files of information which save and retrieve information about your visit to this website – for example, how you entered our site, how you navigated through the site, and what information was of interest to you.

Read more about how we and third parties use cookies in our: <https://shop.eriks.be/en/cookies-page/>

## 6. WHO HAS ACCESS TO YOUR PERSONAL DATA?

### 6.1 Access to your personal data within ERIKS

As a global organisation, data we collect may be transferred internationally throughout ERIKS's worldwide organisation. Your personal data may be exchanged with the ERIKS group, shareholders and associated companies. We exchange your data for administrative purposes and so that we can have a complete overview of your contacts and contracts with the ERIKS group. We may also exchange your data in order to offer you a complete package of services and products.

ERIKS employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform their jobs.

### 6.2 Access to your personal data by third parties

The following third parties have access to your personal data, where relevant, for the provisioning of their products or services to ERIKS: banks, insurance companies, IT suppliers, suppliers or other types of third parties active in marketing, accountants, forensic specialists, consultants.

When third parties are given access to your personal data, ERIKS will take the required contractual, technical and organisational measures to ensure that your personal data are only processed to the extent that such processing is necessary. The third parties will only process your personal data in accordance with applicable law.

Your personal data will be transferred to recipients in countries that do not provide an adequate level of protection for personal data. In such cases, ERIKS will take measures to ensure that your personal data are adequately protected, such as entering into EU Standard Contractual Clauses with these third parties.

In other cases, your personal data will not be supplied to third parties, except where required by law.

### **6.3 The use of your personal data by data processors**

When a third party processes your personal data solely following ERIKS instructions, it acts as a data processor. We enter into an agreement with such a data processor for the processing of personal data. In this agreement we include obligations to ensure that your personal data are processed by the data processor solely to provide services to us.

## **7. HOW ARE YOUR PERSONAL DATA SECURED?**

ERIKS has taken adequate safeguards to ensure the confidentiality and security of your personal data. ERIKS has implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. Examples are IT security policies, staff training and secure servers.

## **8. QUESTIONS OR REQUESTS FOR ACCESS, CORRECTION AND REMOVAL**

You can request access, correction, restriction, portability or removal of the data that ERIKS processes about you at any time by sending a request to: [privacyoffice@eriks.com](mailto:privacyoffice@eriks.com).

If you feel that we do not comply with applicable privacy rules you have the right to lodge a complaint with a competent data protection authority.

## **9. CONTACT INFORMATION**

If you have any questions about the processing of your personal data or would like to submit a request regarding any of your data protection rights, please contact our Privacy Officer via [privacyoffice@eriks.com](mailto:privacyoffice@eriks.com).