

## **PRIVACY STATEMENT**

**Issued: 25 May 2018**

The Cefetra Group respects your right to privacy. This Privacy Statement explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Statement.

### **What personal information does Cefetra Group collect and why?**

The personal information that we process broadly falls into the following categories:

- Information that you provide voluntarily

Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to mailings from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

- Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

- Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include credit ratings and we use the information we receive from these third parties to protect our vital interests and to maintain and improve the accuracy of the records we hold about you.

- Information needed for carrying out our business activities and/or fulfilling our legal obligations

Certain personal data, such as contact details and addresses, are necessary for the due performance of a contract and/or prior to entering into a contract, for example during negotiations. Personal data can also be necessary for complying with a legal obligation, such as tax legislations and statutory retention periods.

### Who does Cefetra Group share my personal information with?

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners if case this is necessary for the due performance of a contract, to comply with a legal obligation, if they** provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Statement or notified to you when we collect your personal information.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

### Lawful basis for processing personal information

Our lawful basis for processing the personal information described above will depend on the personal information concerned and the specific context in which we process it.

However, we will normally only process your data (i) where we have your consent to do so, (ii) where we need the personal information to perform a contract with you, (iii) where we need the data to comply with a legal obligation or (iv) where the processing is in our legitimate interests and not overridden by your rights.

We will process your information for the purposes of operating our platform and communicating with you as necessary to provide our services to you and in our legitimate commercial interests, for instance, when responding to your queries, when performing a contract, distributing mailings improving our platform and/or business operations or for the purposes of detecting or preventing illegal activities.

If you have questions about or need further information concerning the lawful basis for processing your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

### How do we keep your personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

### International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident, but these countries are all subject to European Union data protection laws.

Specifically, our Website servers are located in the Netherlands, and our group companies and third-party service providers and partners operate in Europe. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Statement. These include implementing the contractual clauses for transfers of personal information, which require counterparties/companies to protect personal information they process from in accordance with European Union data protection law.

### Data retention

We retain personal information we process where we have an ongoing lawful basis to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing lawful basis to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information until deletion is possible.

### Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting [dataprotection@cefetra.com](mailto:dataprotection@cefetra.com).
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting [dataprotection@cefetra.com](mailto:dataprotection@cefetra.com).
- You have the right to **opt-out of** mailings we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the mailings we send you.

- Similarly, if we process your personal information with your consent, then you can **withdraw your consent** at any time by notifying [dataprotection@cefetra.com](mailto:dataprotection@cefetra.com) accordingly. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our processing of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### Updates to this Privacy Statement

We may update this Privacy Statement from time to time in response to changing legal, technical or business developments. When we update our Privacy Statement, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Statement changes if and where this is required by applicable data protection laws.

You can see when this Privacy Statement was last updated by checking the “last updated” date displayed at the top of this Privacy Statement.

### How to contact us

If you have any questions or concerns about our processing of your personal information, please contact us using the following details: [dataprotection@cefetra.com](mailto:dataprotection@cefetra.com)

