

Privacy Policy

Hacos

| Date last updated: | 23/09/2020 |
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| Date last approved by management: | 23/09/2020 |

Hacos Privacy Policy (last updated 23 September 2020)

General

This Privacy Policy regulates the processing of your personal data as part of the use of our website (hacos.com) and the associated services. The company carrying out this processing, the controller, is Hacos, with registered offices at B-2390 Malle, Industrieweg 11, company number 0464.675.629.

Protecting personal data relating to our customers and visitors is very important to us at Hacos. We therefore make every effort to guarantee protection of this data and act in accordance with the General Data Protection Regulation (GDPR) at all times when handling your personal data. When personal data is processed on our website (hacos.com), Hacos will always perform the role of controller.

Specifically, Hacos will always process your personal data lawfully and for specific purposes. We will take all measures necessary to ensure that we never request more personal data than required for the purpose or retain this personal data for longer than needed. Finally, Hacos takes the appropriate technical and organisational measures to ensure appropriate security, so that personal data is protected against unauthorised or unlawful processing as well as accidental loss, destruction or damage.

For further information, please do not hesitate to contact us on <u>export@hacos.com</u>.

This Privacy Policy was last updated on 23/09/2020. Hacos reserves the right to make changes to this Privacy Policy at its sole discretion. Hacos will always inform visitors of such changes.

Personal data

We define the processing of personal data as any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

In accordance with current legislation, we understand personal data to mean any information relating to an identified or identifiable natural person (a "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Examples of personal data are a person's name, address or email address, but an IP address is also an example of personal data.

Why do we process your personal data?

Hacos will process your personal data for the following purposes:

| Purposes of processing | Lawful basis |
|--|-----------------------------|
| Handling your question, submitted either through the contact form, by email, over the phone or on social media | Legitimate interest |
| Direct marketing purposes, in order to provide you with individual communication, promotions, offers and other adverts from us or our selected partners | Legitimate interest |
| Keeping you up to date through periodic newsletters | Consent |
| Profiling through use of a cookie that analyses your online activity and preferences. This allows us to keep you informed of activities at Hacos that may be of interest to you | Consent |
| Client management | Performance of an agreement |
| Internal purposes such as audits, data analysis and research, in order to improve products, services and communication | Legitimate interest |

Who do we pass your personal data on to?

We will not provide your personal data to third parties in an identifiable form, except where this is a legal requirement or you have provided your express consent for this.

Hacos reserves the right to anonymise the personal data and then transfer it to other organisations who can use this data to improve products and services and tailor the organisation of the marketing, presentation and sale of products.

Hacos will take the necessary steps to ensure that personal data is only processed within the European Economic Area, except for the following processors:

• MailChimp

These transmissions are subject to the EU-US Privacy Shield. They will take the necessary steps to ensure that your personal data is adequately protected outside the EER too.

How long do we retain your personal data for?

Your personal data will only be processed for as long as this is necessary to achieve the purposes described in this Privacy Policy or until you withdraw your consent. In that case we will take the necessary measures to ensure processing of your personal data is stopped as soon as possible.

What rights can you exercise as a data subject?

As a data subject you have the right to access all personal data relating to you that Hacos processes.

As a data subject you have the right to request rectification if your personal data is incorrect or inaccurate.

If the processing of your data is based on consent, you have the right to withdraw this consent at any time. You can do this by contacting our Data Protection Team on export@hacos.com.

As a data subject you have the right to ask for your personal data to be deleted once it is no longer needed for the purposes in this Privacy Policy or if you wish to withdraw your consent for the processing. This right cannot be exercised if Hacos is obliged to continue processing this personal data under another legal provision, however.

If you would like to exercise the individual rights detailed above or you have any further questions, please do not hesitate to contact us on export@hacos.com. If you wish to exercise your rights, you will always need to verify your identity through appropriate means. This could be sending your request from the email address that is already known to us, for example.

If you are not satisfied with the way your request has been handled, you can submit a complaint at any time to the competent data protection authority, which is the Belgian Data Protection Authority. For further information please see <u>www.privacycommission.be</u>

Cookies

Our website (hacos.com) uses cookies. Cookies are small information files that are stored on your computer's hard drive. This information makes visiting the site quicker and more efficient. If you turn off cookies in your browser, we cannot guarantee that the website will function correctly. The cookies are used primarily to monitor your session and improve your experience of our website.

Our website also uses tracking cookies, which analyse your browsing behaviour so that we can keep you informed of activities at Hacos that may be of interest to you. This analysis is carried out with the help of Google Analytics. This processing of your personal data will only be carried out after you have provided consent. You have the right to withdraw consent for this at any time.

What cookies do we use at <u>hacos.com</u>?

Hacos uses different kinds of cookies. More information about the properties of the different cookies can be found in the following table:

| Personal data | Processing purpose | Name | Туре | Lawful basis | Storage period |
|--|---|------------------|--------------------|--------------|-------------------|
| Device, log file and location data, unique application numbers, local storage, cookies and comparable technologies | Google Analytics: monitoring of statistics about the website | _ga | Non- functional | Consent | 2 years |
| Location and browser settings | Remember language preference | Fluent Locale | Functional | Consent | 3 months |
| IP address | Monitors activity on the website | PHPSE SSID | Non- functional | Consent | End of session |