

## PRIVACY POLICY WINTEB

Winteb (hereafter 'Winteb', 'we', 'us' or 'our') respects your privacy and processes your Personal Data in accordance with applicable privacy rules and regulations, the GDPR. GDPR stands for General Data Protection Regulation (GDPR; Regulation (EU) 2016/679 of April 27, 2016 and any subsequent revision thereof); in The Netherlands the GDPR is also referred to as AVG.

For the sole purpose of this document (referred to as 'Privacy Policy'), the term 'Winteb' comprises Winteb B.V. ('Winteb (HQ)'), having its registered office in Winschoten, The Netherlands, as well as any directly or indirectly affiliated entities.

All words in this document, that start with a capital letter, other than at the beginning of a sentence, are definitions as used in the GDPR.

In this Privacy Policy, we explain, which Personal Data are gathered and how, for which purpose and what reason, how long we store your Personal Data, with whom we share your Personal Data, how we protect your Personal Data, what rights you - as a so-called Data Subject - have, what cookies we use and how you can contact us in relation to our processing of your Personal Data.

### To whom does this Privacy Policy apply?

This Privacy Policy applies to everyone for and about whom Winteb processes Personal Data. An overview of the most important categories of persons is listed below:

- visitors of our website;
- Winteb's customers (and their employees);
- recipients of Winteb newsletters and other mailings;
- Winteb's prospects;
- people involved in transactions in which Winteb acts as product supplier;
- suppliers (and their employees);
- network relations (and their employees); and
- third parties that communicate with Winteb.

### Personal Data

Personal Data means any information that may identify or may have identified a natural person, as meant in the GDPR.

### Which Personal Data does Winteb process?

Winteb processes Personal Data that you have provided to us, Personal Data generated during (a) your visit to our website, (b) your reading of our newsletters, and (c) Personal Data we have derived from other sources. Personal Data means any information relating to you, which may include but not be limited to your first, middle and last name, title, contact details like e-mail addresses, mailing and residence address and telephone numbers, your date of birth, nationality and marital status.

### Provided by you to Winteb:

- Personal Data you provided at engagement of Winteb or during the course of Winteb providing services to you;
- Contact details and other Personal Data that are necessary for handling your case;
- Personal Data you provided by sending or handing over your (digital) business card;

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- Personal Data you provided to Winteb in a conversation, in person, by telephone or through any other medium like social media or an app;
- Personal Data you provided to Winteb in the context of events, seminars, meetings and / or newsletters; and
- Personal Data you provided to Winteb in the context of a job offering, or by your application for a job at Winteb.

#### Personal Data received via our website:

- Data concerning your visit to our website;
- Data concerning the device you used to visit our website, for example your IP address and the type of device used (desktop, laptop, handheld);
- Your surfing behavior and interests.

#### Personal Data received from other sources:

- Personal data received from public online sources such as company websites and social media platforms such as LinkedIn;
- Personal data obtained from the Trade Register of the Chamber of Commerce, the Land Registry, or any similar register;
- Other Personal Data relating to you that we obtained in handling RFQ's, order confirmations, product supply related communications, etceteras via, amongst others, customers, counterparties, lawyers, accountants and banks.

#### Why does Winteb process your Personal Data?

Winteb uses your Personal Data for several purposes on various bases:

- To provide product informational and product related services performed by Winteb's associates for and on behalf of Winteb's customers;
- To comply with our legal obligations, such as data storage obligations and obligations pursuant to the Money Laundering and Terrorist Financing (Prevention) Act ('Wwft') and other similar applicable legislation;
- Based on your explicit, written consent;
- Based on justified reasons, like but not limited to the following purposes:
  - To maintain contact and communicate with you;
  - To perform marketing activities, such as sending newsletters and other forms of marketing communications, like invitations for events, that may be of interest to you or your organization;
  - To process your job application or subscription to one of our events, or any event we participate in;
  - To generate statistical information about the use of our website and / or for analysis and improvement of our website. For a detailed explanation of this, see the section on 'Cookies' in this document;
  - To secure and improve security of our website;
  - To improve the quality of our services; and
  - To conduct customer satisfaction surveys.

#### Protection of your Personal Data

Winteb has taken and continues to take appropriate technical and organizational measures to protect your Personal Data against loss, or against any form of unlawful processing. People at Winteb who have access to your Personal Data or files on Winteb's behalf, have a duty of confidentiality. Winteb applies technological and operational security standards that are generally accepted in its industry, in order to protect Personal Data from being lost, misused, altered or destroyed. If you have any questions about the protection of your Personal Data, or if there are indications of misuse, please contact us: Winteb (HQ), Albert van der Velde, P.O. Box 156, NL-9670 AD Winschoten, The Netherlands, Phone: +31 597 412 252, E-mail: [info@winteb.nl](mailto:info@winteb.nl).

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### Engaging third parties / sharing data with third parties

For the purposes described in this Privacy Policy, Winteb may share Personal Data with an entity that is part of the group Winteb is part of, or to an entity that is directly or indirectly related to Winteb or its UBO's. In certain cases it may be necessary for Winteb to have third parties process Personal Data. A non-exhaustive overview is provided below:

- Third parties that are relevant to the products we supply and any related services we provide, such as counterparties, lawyers, accountants, banks, insurers, insurance agents and intermediaries, courts, regulatory authorities and (semi-)government institutions;
- Third parties, such as regulators, enforcement agencies and other organizations, in order for Winteb to comply with statutory obligations; and
- External suppliers in connection with the processing of your Personal Data for the purposes described in this Privacy Policy, such as ICT suppliers, suppliers of communication services or other suppliers to whom Winteb outsources certain support services.

The transfer of your Personal Data to the abovementioned third parties will only take place for the purposes and on the bases mentioned in this Privacy Policy.

Third parties to whom we provide your Personal Data may themselves be responsible towards you for compliance with applicable privacy rules and regulations. Winteb shall neither be responsible nor be liable for the processing of your Personal Data by such third parties. To the extent that a third party processes your Personal Data as a Processor of Winteb and therefore acts at the request, and on the instructions of Winteb, Winteb will conclude a processing agreement with such third party which meets the requirements set out in the GDPR.

### Data outside the European Economic Area ('EEA')

In order for Winteb to provide its services, it may be necessary for Winteb to transfer Personal Data to a recipient in a country outside the EEA. In such case, Winteb shall ensure that such data transfer is in accordance with the GDPR.

### Purposes for the processing of Personal Data

Winteb may process Personal Data for a number of purposes. The data processing may be necessary to perform a contract or to comply with a statutory requirement. In some cases we will ask for your explicit consent, for example for the use of certain cookies.

Data may also be processed in connection with a justified interest of Winteb, for example for the purpose of internal administration, effective communication, quality improvement or direct marketing activities, which may be in your interest. In the latter case, an opt-out is always offered.

### Retention period

Winteb will not retain your Personal Data any longer than is necessary for achieving the purposes stated in this Privacy Policy or for complying with statutory retention periods.

### Your rights as a Data Subject

As a so-called Data Subject, you have certain rights pursuant to the GDPR:

- You have the right to ask Winteb to correct, supplement, delete or block your Personal Data, if it is incomplete, incorrect or is being processed in contravention of any statutory provision. If you no longer wish to receive newsletters, emails or invitations to seminars, exhibits or shows, you can unsubscribe at any time and at no cost via [info@winteb.nl](mailto:info@winteb.nl);

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- You also have the right to request Winteb to inform you of any Personal Data it holds relating to you, or to request transfer of your Personal Data in a structured, commonly accepted and machine-readable form. Additionally, you have the right to transfer these data to a third party;
- You also have the right to object to Winteb's processing of your Personal Data; you also have the right to withdraw your prior consent to Winteb processing your Personal Data. Winteb will subsequently discontinue the processing of your Personal Data, if such discontinuance is required by law. Winteb however, will continue the processing of your Personal Data if there are justified, imperative grounds to do so, that outweigh your interests, rights and freedom or that are related to bringing, exercising or substantiating a legal act or action; and
- At all times, you have the right to file a complaint about Winteb's processing of your Personal Data to the competent Data Protection Authority.

### Cookies

Winteb uses, or may use functional, analytical and targeting cookies on its website; Winteb does not use tracking or advertorial cookies. Cookies are small text files, which are stored in the website visitor's computer and / or browser; more information about cookies can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set up your browser so that you do not receive any non-functional cookies during your visit to our website. This may influence the functionality of our website. We may use cookies tools to trace information on our systems and to identify certain categories of users on the basis of items such as IP address, domain, browser type and pages visited. This information is passed on to our webmasters, who use it to analyze the number of visitors to the various parts of the website and to guarantee that our website acts as a useful and effective source of information.

For cookies that are not necessary for the use of Winteb's website, we need your permission. On your first visit to our website, we request your unequivocal consent for the use of cookies. This Privacy Policy applies only to the use of Winteb's cookies. The use of cookies and other techniques used by third parties is subject to their own privacy conditions.

### Use of Google Analytics

Winteb uses Google Analytics to obtain insight into e.g. visitor flows, traffic sources and page views on its website. This means that Google acts as Processor in Winteb's processing of your Personal Data. A processing agreement between Winteb and Google applies for this purpose.

Information collected with Google Analytics is anonymized to the extent possible. For example, Winteb does not have detailed insight into individual visitors' details. Google will never process your full IP address and will always mask part of your IP address.

The information obtained is stored by Google on servers in the United States of America. Google is a party to the EU - US Privacy Shield convention of the US Ministry of Trade. Google may only provide your Personal Data to third parties, if Google is legally required to do so, or to the extent that third parties process Personal Data on Google's behalf. For more information, read Google's Privacy Policy.

### Changes

This Privacy Policy was last revised in December 2018. Winteb reserves the right to revise this Privacy Policy if, for example, changes in processing of Personal Data apply, or if relevant rules and regulations are revised. You are advised to regularly visit this webpage. In case of substantial changes, Winteb will post an announcement on its website.

### Miscellaneous

Winteb appointed Albert van der Velde as GDPR compliance officer.

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Nothing in this Privacy Policy is intended to create any obligation or cause any agreement to be concluded between Winteb and any visitor to the Winteb website, or to provide any information in that context.

#### Contact

In case you require further information or have questions or complaints about Winteb's processing of your Personal Data, please contact us by:

E-mail: [info@winteb.nl](mailto:info@winteb.nl); or

By mail: Winteb (HQ), Albert van der Velde, P.O. Box 156, NL-9670 AD Winschoten, The Netherlands.

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