

## PRIVACY STATEMENT

We understand that your trust in us, is most important asset of the limited liability company "**PAUWELS**", having its registered office at Vaartstraat 176, 2520 Oelegem, RPR Antwerp, division Antwerp and registred with the VAT-administration under number 0404.100.020 (hereinafter referred to as "**Pauwels**", "**we**" or "**us**"). As such, your privacy is essential for us.

This privacy statement (hereinafter referred to as "Privacy Statement") is applicable, inter alia, to **(i)** our website <http://www.pauwels-sauces.com> and <http://www.pauwels-sauces.be> (hereinafter referred to as the "Website"), **(ii)** any and every visit to one of the buildings/offices of Pauwels and **(iii)** all (commercial) relations between Pauwels and its customers, prospects and business partners.

This Privacy Statement includes information about the personal data collected by Pauwels, as well as the manner in which Pauwels uses and processes this personal data.

Pauwels wishes to emphasize that it always attempts to act in accordance with **(i)** the Belgian Privacy Law of 8 December 1992 on privacy protection in relation to the processing of personal data and/or **(ii)** the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC and **(iii)** all (future) Belgian laws regarding the implementation of this Regulation.

Visiting the Website, appealing on the services of Pauwels, the purchase of products and/or goods Pauwels, subscribing to the newsletter of Pauwels, any and every form of communication with Pauwels as well as each and every visit to the buildings/offices of Pauwels implies your explicit approval (through disclosure of your personal information or opt-in) of the Privacy Statement and consequently how we collect, use and process your personal data.

Please read this Privacy Statement in conjunction with Pauwels' cookie policy.

### **I. Types of personal data**

Pauwels can collect and process the following personal data:

- ✓ Name
- ✓ Surname
- ✓ E-mail address
- ✓ Telephone number (landline and/or mobile phone)
- ✓ Account name
- ✓ Residence address
- ✓ Customer number
- ✓ Sex
- ✓ Birth data and –year
- ✓ Fax
- ✓ Function
- ✓ Social media data
- ✓ Camera footage
- ✓ Company name
- ✓ Company address
- ✓ Communication preference
- ✓ IP-address

- ✓ All personal data provided in the “free field” of the contact forms on the Website
- ✓ All personal data freely provided to Pauwels (e.g. with regards to communication/correspondence with Pauwels)

Pauwels also automatically collects anonymous information regarding your use of the Website. As such, Pauwels shall, for example, automatically log which sections of the Website and Platform you visit, which web browser you use, which website you visited when you obtained access to the Website. We cannot identify you through these data, but it allows XXX to draw up statistics regarding the use of the Website.

## **II. Methods of personal data collection:**

These personal data are collected in the context of:

- ✓ Visiting the Website
- ✓ Collaboration with Pauwels
- ✓ Incoming and outgoing correspondence with Pauwels
- ✓ Visiting the offices/buildings of Pauwels
- ✓ Requesting an offer from Pauwels
- ✓ Subscription to the newsletter (whether or not through the Website);
- ✓ Exchanging business cards

All personal data, collected by Pauwels, are thus expressly and voluntarily provided by you.

Providing certain personal data is (sometimes) a requirement to be able to enjoy certain services (e.g. to gain access to certain parts of the Website, to subscribe to newsletters, to participate in certain activities and events). In this respect, it shall be indicated which data must be provided mandatory and which data is optional.

## **III. Use of personal data**

Pauwels can use your personal data for the following purposes:

- ✓ Performance of the agreement with Pauwels (incl. follow-up thereof)
- ✓ Responding to questions (whether or not received through the contact form)
- ✓ Optimising the quality, management and content of the Website
- ✓ Sending newsletters
- ✓ Creating statistics
- ✓ Drawing up a quote
- ✓ Follow-up after a meeting
- ✓ Providing support/assistance
- ✓ Send targeted marketing and advertising, updates and promotional offers, based on your communication preferences and – where applicable – based upon your explicit consent
- ✓ Registration of visitors at the offices/buildings of Pauwels
- ✓ Issuing invoices and the collection of the payments thereof

Processing takes place on the following legal grounds, as the case may be:

- ✓ U have given consent to the processing of your personal data for one or more specific purposes
- ✓ Processing is necessary for the performance of the agreement with Pauwels or in order to take steps at your request prior to entering into an agreement

- ✓ Processing is necessary for compliance with a legal obligation to which Pauwels is subject
- ✓ Processing is necessary for the purposes of the legitimate interests pursued by Pauwels or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child).

#### **IV. Disclosure of personal data to third parties**

Pauwels shall not disclose your personal data to third parties, unless it is necessary in the context of performing the agreement and optimisation thereof (including but not limited to Maintenance, payment processing, transport or deliveries, in the light of database management as well as for the delivery of services to XXX (i.e. in the light of subcontracting)). In this respect, your personal data may be disclosed to payment providers, software providers, cloud partner, transport partners, external IT-consultants, financial institutions, insurance companies, service providers (such as translators, consultants and photographers).

If it is necessary that Pauwels discloses your personal data to third parties, the third party concerned is required to use your personal data in accordance with the provisions of this Privacy Statement.

Notwithstanding the foregoing, it is however possible that Pauwels discloses your personal data:

- ✓ To the competent authorities **(i)** if Pauwels is obliged to do so under the law or under legal or future legal proceedings and **(ii)** to safeguard and defend our rights
- ✓ If Pauwels, or the majority of its assets, are taken over by a third party, in which case your personal data – which Pauwels has collected – shall be one of the transferred assets

In all other cases, Pauwels will not sell, hire out or pass on your personal data to third parties, except when it **(i)** has obtained your permission to this end and **(ii)** has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

#### **V. Cross-border processing of personal data**

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer agreement, which shall contain **(i)** the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or **(ii)** any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.

#### **VI. Storage of personal data**

Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, Pauwels shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Statement under 'Use of personal data'.

#### **VII. Your privacy rights**

In light of the processing of your personal data, you enjoy the following privacy rights:

- ✓ Right of access to your personal data
- ✓ Right to rectification, completion or update of your personal data
- ✓ Right to delete your personal data ('right to be forgotten'). (Pauwels wishes to point out that in this context certain services will no longer be accessible and/or can no longer be provided if you delete resp. request deletion of certain required personal data)
- ✓ Right to limit the processing of your personal data
- ✓ Right to transferability of your personal data

- ✓ Right to object to/oppose the processing of your personal data

If you wish to invoke your privacy rights please contact [privacy@pauwels-sauces.com](mailto:privacy@pauwels-sauces.com).

If you no longer wish to receive newsletters or information about the services, products and/or goods of Pauwels, you can unsubscribe at any time by clicking the "unsubscribe" button underneath each of Pauwels emails.

#### **VIII. Security of personal data**

Pauwels undertakes to take reasonable, physical, technological and organisational precautions in order to avoid **(i)** unauthorised access to your personal information, and **(ii)** loss, abuse or alteration of your personal data.

Pauwels shall store all personal data, which it has collected in the servers on the sites of Pauwels, as well as in the cloud with database in the EU for certain HR-related processing.

Notwithstanding Pauwels' security policy, the checks it carries out and the actions it proposes in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, XXX is, in this context, not in a position to guarantee absolute security.

#### **IX. Update Privacy Statement**

Pauwels is entitled to update this Privacy Statement by posting a new version on the Website. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Statement, to make sure that you are aware of any changes.

#### **X. Other websites**

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. Pauwels does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

#### **XI. Contact Pauwels**

If you have questions and/or remarks about this Privacy Statement or the manner in which Pauwels collects, uses and/or processes your personal data, please contact us:

- ✓ Via e-mail: [privacy@pauwels-sauces.com](mailto:privacy@pauwels-sauces.com)  
or
- ✓ Via post: "Pauwels" NV  
Vaartstraat 176  
2520 Oelegem

In case you are not satisfied with the way Pauwels handled your questions and/or remarks or have any complaints about the way Pauwels collects, uses and and/or processes your personal data, note that you have the right to lodge a complaint with the supervisory authority.