



Privacy policy Milgro B.V. – For Clients, Recipients and Visitors

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CHAPTER 1. INTRODUCTION

This privacy policy applies to the processing of all personal data concerning the clients of Milgro.

Protecting your privacy is of the utmost importance to Milgro. We therefore take our responsibility with regard to protecting your personal data very seriously. Milgro has taken various measures, including drawing up this privacy policy for its clients. The purpose of this privacy policy is to provide transparency about the manner in which Milgro collects, processes and protects your personal data. The General Data Protection Regulation (GDPR) defines personal data as any data relating to an identified or identifiable private person. This means personal data is information that either concerns a person directly or can be traced back to them.

We advise you to read this privacy statement carefully to understand how we treat your personal data. We will only use your personal data for the purpose for which we acquired these data. In our case, that purpose concerns all aspects of our client relationship. We inform clients about our privacy policy via our website.

CHAPTER 2. ABOUT US

Milgro B.V. (Pittsburghstraat 31, 3047 BL, Rotterdam) is responsible for the processing of your personal data.

CHAPTER 3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We only process your personal data for carefully defined purposes. For example, we may receive personal data concerning you because we have an agreement with you or your employer. In legal terms, processing these data is necessary for the preparation or performance of an agreement. Simply put, we cannot be of service to you (or your employer) as a client if we do not process these personal data concerning you. Your personal data are also used for the purpose of our marketing activities. We process your personal data in light of our legitimate interest in conducting marketing activities. The different purposes of our data processing activities are explained in more detail below.

- 1. For the performance and execution of orders, projects and requests (daily business operations)*
Once you place an order, project or request, we will process such data as your first and last name, telephone number, email address, (if applicable because you are acting on behalf of a one-man business: address information, bank account and VAT numbers). We will also store information about prior orders and/or cancellations in your account. This allows us to be of better service to you. Once you place, change or cancel an order, project or request, you will always receive a confirmation via email from us. This purpose is necessary for the performance of a contract (article 6 section 1 subsection b GDPR).
- 2. To create and maintain your account in our client portal*
You can create an account to use our client portal. Your account contains personal information, including your name, surname, telephone number, password and email address. If you act on behalf of a one-man business and your private address is the same as your business address, we will also process your address information. You can change the personal information linked to your account at any time. This purpose is necessary for the performance of a contract (article 6 section 1 subsection b GDPR).
- 3. For customer service: processing questions/remarks/complaints*



You can reach us via telephone or email. To ensure we can assist you immediately, we use the data available in our customer relationship management system, which include your contact information, order history, etcetera. In conference with you, we can also access your business account to resolve any issues you are experiencing. This purpose is necessary for the performance of a contract (article 6 section 1 subsection b GDPR) and/or our legitimate interest (article 6, section 1, subsection f GDPR).

4. To conduct analyses and develop our website, products and services

We will ask you to take part in client surveys to e.g. measure your satisfaction. Your feedback and (online) client behavior are very valuable to us, as they allow us to provide and improve our services. We will always give you the option to opt out of participating in such client surveys by using the opt-out button found at the bottom of the email invitation. The legal grounds is our legitimate interest in the efficiency of our business operations (article 6 (1) f GDPR).

We also process personal data concerning you that you provide to us indirectly. Our website uses cookies for functional, analytical and marketing purposes. The functional cookies are necessary in order to use our website. This concerns the following data:

- Location data
- IP address or app IDs
- Internet browser and device type
- Website language

For more information about our use of cookies, please refer to our cookie statement. The legal grounds is permission, which you give by accepting our cookie terms in the cookie banner on our website (article 6 section 1 subsection a GDPR).

5. Sending out offers, news and promotions via email

You will only receive marketing messages from us if you: i. gave us permission to send you such messages, e.g. by requesting information about a product, or ii. if you (or your organization) are (is) a client of ours and you did not indicate that you no longer wish to receive marketing messages.

If you no longer wish to receive marketing messages or our newsletter, you can unregister by clicking the opt-out button found at the bottom of the email. The legal grounds is our legitimate interest (article 6 (1) f GDPR) or permission (article 6 section 1 subsection a GDPR).

6. To comply with legal obligations

At times, we may be required on the grounds of a legal obligation to share personal data with government organizations. For example, we are required by law to share certain financial data with the Tax Administration for the purpose of our administration. We are also legally obligated to cooperate with investigations conducted by e.g. the police.

What type(s) of personal data we process for this purpose differs per legal obligation. To comply with most of these legal obligations, we process your contact, address, absenteeism and financial information. The legal grounds is a data controller's requirement to comply with a legal obligation (article 6 section 1 subsection c GDPR).

CHAPTER 4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Milgro will not sell or trade your personal data to third parties. Milgro may share certain personal data with a supplier or a service organization that requires the use or recording of your personal data for the aforementioned



purposes, in accordance with relevant legislation. In such rare cases, a specific supplier or service organization may gain access to your personal data. Before Milgro shares your personal data with a third party, Milgro will make sure that the party in question has implemented and conforms to strict data security standards.

Milgro may also be required to share your personal data to protect Milgro's legal rights, again in accordance with relevant legislation. Furthermore, your personal data may be shared with:

- IT service providers. While maintaining, managing and supporting our systems and applications, they may gain limited access to various types of personal data. We will always be consulted in advance if this is the case.
- Consultants such as bailiffs, lawyers and/or administrators. In some cases, we will share your name and contact information and/or financial information with such parties.

We will sign (insofar as this is possible to do) data processing agreements with parties who process personal data on our behalf (so-called "processors"). We do this to make sure that, when we share data with them, their obligations - e.g. with regard to data security and having to inform us in a timely manner of a (suspected) data leak - are properly recorded.

CHAPTER 5. HOW DO WE PROTECT YOUR PERSONAL DATA?

On the grounds of article 32 GDPR we are required to take appropriate technical and organizational measures to prevent the loss or unlawful processing of personal data. We have implemented various physical, administrative, organizational and technical measures to protect your personal data.

Only authorized employees have access to your data. These employees have all signed a confidentiality agreement. Due to this and other measures, we have implemented an appropriate security level in our organization. We will periodically adjust this security level when necessary.

Our organization is set up in such a way as to prevent data security breaches or data leaks. In the event of a data leak, we will act in accordance with the Data Leak Protocol.

CHAPTER 6. HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will store your personal data as long as necessary for the purpose for which we use your data and/or as long as we are legally obligated to store your data. The exact duration of the data storage period differs from several months to many years, e.g. because this is necessary for administrative purposes. We will store your personal data for at least as long as you are our client. You can access and/or update your personal data at any time via your personal account.

CHAPTER 7. WHERE DO WE STORE YOUR PERSONAL DATA?

We use various applications to gather and store certain types of personal data. To safeguard your privacy, we carefully choose our suppliers and these applications are subject to strict regulations. Most data are stored within the European Union.

With regard to the data that are stored outside the EU, we only work together with parties who maintain a sufficient level of data security in accordance with European regulations. If we process your data outside the EU (possibly via



our external service providers), we will make sure your personal data are adequately protected, e.g. by working with special contacts who can guarantee a sufficient level of data security.

CHAPTER 8. YOUR RIGHTS

You have the right to be well informed about how we process your personal data and the purposes we require your data for. We provide this information in the form of this privacy policy. In addition to your right to be informed in a transparent manner, you also have the following rights:

- Right to access (if you wish to know what personal data concerning you we collect);
- Right to rectification (you can ask us to rectify any incorrect or outdated information);
- Right to be forgotten (under certain circumstances, you can ask us to delete any personal data concerning you that we have collected);
- Right to restriction of processing (under certain circumstances, you can ask us to restrict our processing of your personal data);
- Right to data portability (at your request, we will submit your data to a different party or provide you with a copy of your personal data);
- Right to object (under certain circumstances, you can object to our use of your personal data).

If you wish to exercise any of your rights, you can contact us using the contact information listed in chapter 9. If we have valid reasons to deny your request, we will inform you about these reasons.

CHAPTER 9. CONTACT

If you have any questions, requests or complaints concerning our processing of your personal data, you can contact our privacy officer(s) using the following contact information.

Contact: Hanneke den Otter
Telephone number: 010 -2380310
Email address: privacy@milgro.nl

If you have a complaint, e.g. regarding the manner in which we use your personal data or how we respond to your questions concerning your privacy, you can submit a complaint to the Data Protection Authority.