



## WEBSITE PRIVACY NOTICE

**Issued: 25 May 2018**

The BayWa group respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Notice only applies to personal information that we collect through our website at [www.cefetra.com](http://www.cefetra.com). (“**Website**”).

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 Notice.

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

The personal information that we may collect about you through the Website 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 marketing communications 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 [give examples] and we use the information we receive from these third parties to [give reasons, e.g. maintain and improve the accuracy of the records we hold about you].

### **Who does Cefetra 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** who 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 Notice 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;
- to any **other person with your consent** to the disclosure.

### **Legal basis for processing personal information**

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

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

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

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, undertaking marketing activities, improving our platform or for the purposes of detecting or preventing illegal activities.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

### **How does [BAST entity/ website owner] keep my personal information secure?**

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. 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 Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

### **Data retention**

We retain personal information we collect from you where we have an ongoing legitimate business need 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 legitimate business need 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 and isolate it from any further processing 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 us using the contact details provided under the "How to contact us" heading below [\[link\]](#).
- 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 us using the contact details provided under the "How to contact us" heading below link.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "How to contact us" heading below link.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. 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 collection and use 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 Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, 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 Notice changes if and where this is required by applicable data protection laws.

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

#### **How to contact us**

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

The data controller of your personal information is Cefetra B.V..