



## Privacy Statement Copaco Nederland B.V.

*Copaco Nederland B.V. endeavours to protect the privacy of users of its websites. Please read this privacy statement carefully and in full before using the websites.*

---

### 1. Definitions

Applicable Privacy Legislation:	Applicable privacy legislation, including the General Data Protection Regulation (hereinafter: GDPR), the GDPR implementation Act [ <i>Uitvoeringswet AVG</i> ] and any other applicable act or regulation relating to the processing of personal data.
Contract:	The Contract between a customer and Copaco or a third party for the purchase and delivery of products.
Controller:	The natural or legal person, public authority, agency or other body who or which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
Copaco	Copaco Nederland B.V. Hoevenweg 21 5652 AW Eindhoven  This privacy statement also applies to processing of personal data by Copaco N.V. and to such processing by subsidiaries in the Netherlands, Belgium and France.
Personal Data:	Personal Data is any information relating to an identified or identifiable natural person that is processed by Copaco.
Privacy Statement	The present Privacy Statement.
Processing:	An operation or set of operations that is performed on personal data or on sets of personal data whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by



transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor:	The person who processes Personal Data on behalf of the Controller, without being subject to his direct authority.
Website Visitor:	The person who uses the Websites of Copaco.
Website:	All the websites of Copaco.

## **2. Scope Privacy Statement**

- 2.1. This Privacy Statement applies to every use of the Website and governs the processing of Personal Data via the Website.
- 2.2. The Website may include references to third-party websites (hyperlinks, banners or buttons, for example). Copaco is not responsible for the compliance by these third parties with the Applicable Privacy Legislation.

## **3. Processing of Personal Data**

- 3.1. Copaco may collect your Personal Data from various sources, such as: directly from you, from other users, from resellers and distributors, from our suppliers, from our service providers, from third-party information providers, from our subsidiaries and through the operation of the Website.
- 3.2. Copaco may collect the following Personal Data:
  - Name and address details
  - Information about the order (purchase information and history)
  - Email address
  - Username and password
  - IP address
  - Payment details
  - Phone number
  - Location details
  - MAC address
  - Curriculum Vitae (in case of job applications)
  - A combination of your username and password, used to access our Website
  - Other information provided by you via our contact form.
- 3.3. Copaco will process the Personal Data only in accordance with the Applicable Privacy

Legislation.

3.4. Copaco will only use your Personal Data as described in this Privacy Statement.

#### 4. Purposes and legal grounds for processing

4.1. Copaco collects and processes your Personal Data solely for the purposes specified below:

- a. **Performance of a Contract:** The processing is necessary for the performance of the Contract with you. When you place an order, your Personal Data will be processed by Copaco for the purpose of performing the Contract. This includes processing orders and the handling of payments, delivering products and collecting outstanding receivables. No Personal Data will be processed other than strictly necessary for the performance of the Contract (Article 6(1)(b)GDPR).
- b. **Communication:** Your Personal Data will be used to communicate with you about your order and to inform you of matters that are important for your account and/or use of the Website and the handling of any complaints. If you create an account on the Website, we will keep the Personal Data so that you do not have to enter it every time. This Processing of Personal Data is necessary for the performance of a Contract (Article 6(1)(b) GDPR) and/or for purposes of a legitimate interest of Copaco, which is to conduct its regular business (Article 6(1)(f) GDPR).
- c. **Marketing Purposes:** Your Personal Data may be used for the purpose of sending out Copaco's newsletter, if you have registered for it. To approach you via email for marketing purposes of Copaco, Copaco always requests your prior consent, unless it concerns offers about products similar to those that you have ordered. You always have the option to unsubscribe from mailings. This Processing of Personal Data is based on consent (Article 6(1)(a) GDPR) or is necessary for Copaco to carry out marketing activities (Article 6(1)(f) GDPR).
- d. **Customer Service:** If you use Copaco's customer service, your Personal Data may be used to provide you with customer service. This Processing of your Personal Data is necessary for the purpose of the legitimate interest of Copaco (Article 6(1)(f) GDPR).
- e. **Training courses and events:** Your Personal Data will be used if you have registered to participate in training courses or events organised by Copaco or third parties engaged by Copaco. This Processing of Personal Data is based on consent (Article 6(1)(a) GDPR) or is necessary for Copaco for the performance of the Contract you have with Copaco for following a training or participating in an event (Article 6(1)(a) GDPR).
- f. **HR activities:** Your Personal Data may be processed if you respond to a vacancy. This data is also used for communication purposes about (current) applications. This



Processing of your Personal Data is necessary for the purposes of the legitimate interest of Copaco (Article 6(1)(f) GDPR).

## **5. Processing of personal data by third parties**

5.1. Copaco only discloses your Personal Data with third parties, after it has made agreements with these third parties about the processing of Personal Data. In this way, Copaco ensures that the Processors take appropriate technical measures, treat the Personal Data confidentially and guarantee the rights of Website users.

5.2. Copaco may share your Personal Data with its subsidiaries. Copaco may also share your Personal Data with other business units that also offer products or services under the Copaco brand or one of our other brands, as well as vendors and suppliers, resellers, credit insurers, banks / payment service providers and carriers. Our subsidiaries and business units will use your Personal Data in a manner consistent with this Privacy Statement.

5.3. Applying for vacancies via LinkedIn or Indeed:

5.3.1. Applying from your LinkedIn account:

If you are busy and want to apply at lightning speed, you can do so within 10 seconds. If you press the "apply via LinkedIn" button, you give LinkedIn permission to send your data to us. The entry fields will then be completed immediately with the exception of your telephone number. However, LinkedIn sends us more! And it is important that you know so. Your photo, your headline, your summary of your profile are shared. Rather than your CV, LinkedIn sends us a PDF of almost your full LinkedIn account (more precisely: location, skills, experience and training). LinkedIn also sends the URL of your LinkedIn account. Very handy and "with it", but if you want more control over what you share with us, it is better to apply in the usual way. That will take you a maximum of 1 minute.

5.3.2. Applying from your Indeed account:

If you are busy and want to apply at lightning speed, you can do so within 10 seconds. If you press the "apply via Indeed" button, you give Indeed permission to send your data to us. The entry fields will then be completed immediately with the exception of your telephone number. However, Indeed sends us more! And it is important that you know so. Your photo, your current position and CV are shared. Handy, but if you want more control over what you share with us, it is better to apply in the usual way. That will take you a maximum of 1 minute.

## **6. Security**

6.1. Copaco takes appropriate organisational and technical security measures to protect your Personal Data and to prevent misuse, loss or alteration thereof.



6.2. Copaco stores your Personal Data on servers in the European Economic Area (EEA). If and insofar as Copaco stores Personal Data with parties in countries that do not have an adequate level of protection, it will agree with these parties standard data protection provisions as set by the European Commission. A copy of the agreed standard provisions is available on request from: [compliance@copaco.com](mailto:compliance@copaco.com).

## 7. Retention Periods

7.1. Copaco does not store your Personal Data any longer than strictly necessary for the purposes for which it collects the Personal Data or, if relevant, for the minimal fiscal retention period. If you have any questions about the retention periods, you can contact Copaco's compliance officer by sending an email to the following address: [compliance@copaco.com](mailto:compliance@copaco.com).

7.2. You may request Copaco to delete your Personal Data earlier. If the Personal Data is no longer required for the purposes for which Copaco collected it or otherwise processed the Personal Data, Copaco will remove the Personal Data.

## 8. Cookies

8.1. Copaco uses cookies to ensure that the Website functions properly.

8.2. Cookies are small pieces of information that are stored by the browser on the computer of the Website Visitor. Copaco uses different types of cookies for different purposes.

- **Functional cookies:** Cookies that are necessary for the Website to function properly, including cookies that are necessary to create an account.
- **Analytical cookies:** Cookies that ensure that insight can be gained into how Website Visitors use (parts of) the Website, so that Copaco can improve the Website and that it fits as well as possible with what Website Visitors find interesting and important. Copaco does not use the data obtained from these cookies to study the use of the Website at an individual level, but only at an aggregated level.
- **Tracking cookies:** These cookies allow us to recognise repeat visitors to our websites. By comparing an anonymous, randomly generated identification, a tracking cookie keeps track of where users of our websites come from, which search engine they use, which link they click on, which keywords they use and where they are located when opening the website. Tracking this information allows Copaco to improve the Website.

8.3. The list of all tracking and analytical cookies used is described in our Cookie Statement.

8.4. To the extent required by law, Copaco will request the unambiguous prior consent of the Website Visitor via the cookie pop-up. Functional cookies necessary for the proper operation of the Website do not require prior written consent from the Website Visitor.

- 8.5. A distinction can be made between cookies that are used per session (created each time you visit a website and expiring when you leave it) and cookies that are stored on your device for a certain period of time (ranging from a few hours to a year or more) and will not be removed when the browser is closed. Copaco's software is designed in such a way that these cookies cannot be used for other purposes. Cookies do not affect the Website Visitor's system or damage the files of the Website Visitor.
- 8.6. If you do not want cookies to be placed on your computer at all, you can adjust the browser settings so that you receive a warning before cookies are placed. You can also adjust the settings so that your browser refuses all cookies or only cookies from third parties. You can also remove the cookies that are already on your computer. Consult the manual of your browser to adjust the settings.

## **9. Your data protection rights**

We would like to point out that you have the following rights:

- a. If you wish to access, correct, update or delete your Personal Data, you can request this at any time by contacting us using the contact details provided at the bottom of this text;
- b. In addition, you can object against the processing of your Personal Data, ask us to restrict the processing of your Personal Data or request the transfer of your Personal Data. You can exercise these rights by contacting us using the contact details provided at the bottom of this text;
- c. You have the right to unsubscribe from marketing communications at any time. You can exercise this right by clicking on the unsubscribe or opt-out link in the marketing emails we send to you. If you wish to unsubscribe from other marketing forms (such as postal marketing or telemarketing) please contact us using the contact details provided at the bottom of this text;
- d. If we have collected and processed your Personal Data with your consent, you can withdraw your consent at any time. Withdrawing your consent does not affect the lawfulness of any processing we performed prior to your withdrawal. Nor does it affect the processing of your Personal Data that is performed on legal grounds for processing other than consent;
- e. You have the right to lodge a complaint with a data protection authority about our collection and use of your Personal Data. For more information, please contact the Dutch Data Protection Authority.

We respond to all requests we receive from individuals who wish to exercise their data protection rights under applicable data protection laws.



## **10. Other provisions**

- 10.1. Copaco is entitled at all times to delete your account without notice. In such event, Copaco does not owe any compensation to you because of the termination of the account.
- 10.2. Copaco reserves the right to change this Privacy Statement on a regular basis. It is your responsibility to regularly review the applicable conditions. This Privacy Statement was last amended and revised on 16 July 2020.
- 10.3. If a provision from this Privacy Statement is in conflict with the law, it will be replaced by a provision of the same purport that reflects the original intention of the provision, all this to the extent legally permissible. In that event, the remaining provisions continue to apply unchanged.

## **11. Contact**

If you have any questions about this Privacy Statement, Copaco's privacy procedures, the collection or use of your Personal Data, or if you wish to access your Personal Data, please contact us at:

Copaco Nederland B.V.  
attn. de Compliance Officer  
Hoevenweg 21  
5652 AW Eindhoven

Or by email: [compliance@copaco.com](mailto:compliance@copaco.com).

Last revised: 16 July 2020