

Privacy Policy

Tromp Group, including the affiliated Companies – Tromp Sheeting & Depositing Systems, Den Boer Baking Systems and VanderPol Waffle Systems - (the Company) is committed to protecting information which identifies and relates to you or other individuals (personal information) and complying with data protection laws.

Important

This privacy policy sets out the Company's personal information collection and sharing practices in relation to the personal information relating to customers, clients, suppliers, vendors, advisers, and service providers (you) that we collect and use in our business. This privacy policy also covers any personal information collected through your use of our website (the Site).

Our Site may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information.

1. Information we may collect about you

We may collect and process the following personal information about you:

- information that you provide by filling in forms or upload to us;
- if you contact us, we may keep a record of that correspondence, voicemail or details of any conversation we may have with you;
- details of your visits to our website and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access;
- details of transactions you carry out through our Site, including any quotations obtained; and
- information that is available from publically available sources including social media sites.
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2. Why we collect information about you

We may process personal information for certain legitimate or lawful purposes in some or all of the following ways:

- to enhance the security of our network and information systems;
- to identify and prevent fraud;
- to maintain our accounts and records;
- to modify, personalise or otherwise improve our services/ communications;
- to comply with foreign law, law enforcement, court and regulatory bodies' requirements;
- to comply with a legal obligation;
- to protect your vital interest or the interest of another individual;
- to gather market intelligence, communicate with and tailor offers to individuals;

- for training and quality purposes;
- for the performance of a contract with you or to take steps to enter into a contract; and
- to perform of a task carried out in the public interest or in the exercise of an official authority.

3. How we may use your personal information

We may use your personal information in the following ways:

- to make decisions on whether to engage in business with you;
- to monitor calls and transactions to ensure service quality, compliance with procedures, to combat fraud and insure compliance with EU and international sanctions;
- to identify you and to carry out any identity checks as may be required by applicable law and best practice at any given time;
- to recover any payments due to us and where necessary to enforce such recovery through the engagement of debt collection agencies or taking other legal action;
- to analyse it in order to understand the service we provide and in order to improve our business;
- to manage our infrastructure, business operations and comply with internal policies and procedures;
- to notify you about changes to our service; and
- for marketing services to you by post, email, SMS, phone and fax.

We will never process your data where these interests are overridden by your interests.

4. Consent

Your consent to our processing of your personal information for certain purposes may be necessary to comply with applicable data protection laws; and where this is the case we will ask you for your consent in accordance with those laws.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent in relation to insurance cover that we have provided then this is likely to impact our ability to provide that insurance cover and pay claims under the cover.

5. Sharing your personal information

The Company may make personal information available to:

- **Our group companies**
We have group companies throughout the world, both inside and outside Europe (for example, in the USA). We may share your personal data with our group companies, but only for the purposes set out in this privacy policy and we remain responsible for the management and security of personal information. Access to personal information within the Company and our group companies, is restricted to those individuals who have a need to access the information for our business.

- **Other third parties**

We may also permit selected third parties including; suppliers, service providers, financial organisations; access to your personal information, for the purposes set out above. All such exchanges will be made in accordance with applicable laws. If false or inaccurate information is provided and/or fraud is identified or suspected, details may be passed to fraud prevention and anti-money laundering agencies, law enforcement agencies or other insurers and may be recorded by us or by them.

We and other organisations may also access and use this information to prevent fraud and other crime, for example when deciding whether to make a payment to you under an insurance or reinsurance policy;

We, and other organisations that may access and use information recorded by fraud prevention agencies, may do so from other countries including outside the EEA.

- **Governmental authorities and third parties involved in court actions**

We may disclose your personal information to third parties, the courts and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or in order to enable the Company to comply with its regulatory requirements or dialogue with its regulators as applicable.

6. Transmission, storage and security of your personal information

Unfortunately, no data transmission over the Internet or any website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with applicable data protection laws.

All information within our control is stored on our secure servers (or secure hard copies) and accessed and used subject to our security policies and standards.

Where the Company discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site or any other portal we operate, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

Your personal information may be accessed by staff or authorized third parties and, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) where the data protection laws may be of a lower standard than in the EEA. Regardless of location or whether the person is an employee or contractor we will impose the same data protection safeguards that we deploy inside the EEA.

7. Retention of your personal information

We will retain your personal information for as long as is reasonably necessary for the purposes listed in this privacy policy. This may mean that we hold your personal information

for some time where, for instance, there is a possibility that it may be needed to comply with recordkeeping, tax, accounting, regulatory or legal requirements. Where your personal information is no longer required we will ensure it is securely deleted.

8. Your rights

Data protection laws give you rights in relation to the personal information we hold about you, which may include the right to require us to:

- provide you with further details on the use we make of your personal information
- provide you with a copy of the personal information we hold about you
- update any inaccuracies in the personal information we hold about you
- delete any of your personal information that we no longer have a lawful ground to use
- where processing is based on consent, stop that particular processing by withdrawing your consent
- object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights
- restrict how we use your personal information whilst a complaint is being investigated
- transfer your personal information to a third party in a standardised machine-readable format

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

9. Contacting us

You can contact us about privacy related issues by:

- sending an email to Nathalie de Haan, n.dehaan@trompgroup.nl; or
- writing to Tromp Group BV, att. Marketing Department, Edisonweg 9, 3752 LV Bunschoten, The Netherlands
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10. Changes to our privacy policy

We may change the content of our website or services without notice, and consequently our privacy policy may change at any time in the future. We therefore encourage you to review it from time to time to stay informed of how we are using personal information.

11. Your right to complain

If you are not satisfied with our use of your personal information or our response to any request by you to exercise your data protection rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal information. If you are unsure of the authority that supervises our processing of your personal information then please contact us for further guidance.