

## **TEUCONNECT B.V. PRIVACY POLICY**

Teuconnect B.V. attaches great importance to the privacy of those who provide personal data to us. This privacy policy (the "Policy") describes how and why we collect, store and use personal data, and provides information about the rights of the individual.

This policy applies to both personal data provided to us by an individual or by organisations. We may use personal information provided to us for any of the purposes set out in this policy, or as otherwise disclosed at the time of collection.

This policy must be read together with the terms of use of the Teuconnect B.V. websites and, in case of use of the services, with the agreement concluded between the customer and Teuconnect B.V..

### **1. What terms are used in this Privacy Policy?**

"Affiliate" means any company, company or other entity that directly or indirectly controls, is controlled by, or is under common control with Teuconnect B.V. or the Customer.

"Agreement" means the General Terms and Conditions of Teuconnect B.V., any order form or contract proposal accepted by the Customer in any form whatsoever for the subscription to Services and the approval thereof by Teuconnect B.V., the documentation relating to the Services (including but not limited to user manuals, training materials, supporting materials, technical specifications and requirements), and, if applicable, all applicable Special Terms and Conditions of Teuconnect B.V., this Policy together constitutes the entire agreement governing the relationship between Teuconnect B.V. and the Customer.

"Teuconnect B.V." means Teuconnect B.V. located in Lienden (Gelderland) and registered with the Chamber of Commerce under number: 90737245.

"Customer" means the (natural or legal person) who subscribes to the Services.

"Data protection legislation": the provisions of EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) and Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector, as well as any national laws and/or regulations implementing them, as this legislation may be amended or replaced from time to time.

"Services" means the products and services of Teuconnect B.V. and its Affiliates, as they may change from time to time, to which the Customer has subscribed under the Agreement.

"User" in this Policy refers to the visitors of the Websites and/or to the users of the Services on behalf of the Customer.

"you" and "your" (and other similar terms) to refer to Customers, individuals associated with Customers, Users, contacts, suppliers and job applicants.

"we", "us" and "our" (and other similar terms) to refer to Teuconnect B.V.

"Websites" refers to all internet pages and applications offered and managed by Teuconnect B.V.

For the purposes of this Policy, other terms such as "personal data", "processing", "data subject", "data controller", "data processor" and "supervisory authority" have the meanings set out in applicable data protection law.

## **2. Who is responsible for your personal data?**

Depending on the relationship between you and us, Teuconnect B.V. is responsible for your personal data as a data controller or as a data processor. Our contact details can be found below.

## **3. What personal data do we collect and process?**

Depending on the relationship between you (e.g. customer, supplier, job applicant) and us, we may collect and process some of the following personal data from you:

Identity and contact information, including your name, address, telephone number, date of birth, language, marital status, passport number, employment history, educational or professional background, tax status, employee number, job title and position, seniority, and other personal information related to your preferences that is relevant to our Services;

Financial and payment information, including your bank account and other information necessary for payment processing and fraud prevention, including credit/debit card numbers, security code numbers, and other related billing information;

Company information, including information provided in the course of the Agreements or otherwise voluntarily provided by you or your organization;

Communication information, including the content of communications exchanged between you and us or between you and other users;

Profile and usage data, including your preferences when receiving marketing information from us, your communication preferences and information about how you use our services, social media pages and websites, including the services you have viewed or searched for, page response times, download errors, duration of visits and page interaction information (such as scrolling, clicks and mouse-overs), dates and times of when you perform various activities on the websites or Teuconnect E.g. applications and the status of your personal account settings;

Technical data, including information collected during your visits to the Websites, Internet Protocol (IP) address, login details, browser type and version, device type, time zone setting, browser plug-in types and versions, operating system and platform;

Geolocation data, including information about your locations or estimated time of arrival collected during your use of the Services;

Physical access data, relating to details of your visits to our premises;

If you provide us with information about a person other than yourself (your family, employer, employees, counterparties, advisors, suppliers...), you must ensure that they understand how their information will be used and that they have given their consent for you to disclose it to us and for you to allow us and our outsourced service providers, to use it. If we need personal data relating to individuals associated with customers to provide services, we ask customers to provide this policy to such individuals as data subjects.

#### **4. How do we collect your personal data?**

In most cases, we collect personal data (1) from customers and users or (2) if you sign up to attend one of our events and/or to receive our communications. In some circumstances (3) we may collect personal data from third parties. The circumstances in which we may collect personal data about you are the following:

when you use one of our Services;

when you seek advice from us;

when you offer to provide or provide services to us;

when you correspond with us by telephone, email or other electronic means, or in writing, or when you provide other information directly to us, including in conversation with our employees, third party suppliers or consultants;

when you browse, fill out a form or ask a question or otherwise interact on our Websites or other online platforms;

when you attend our events or sign up to receive information from us;

by inquiring with your organisation or other organisations with which you do business, such as former employers and educational institutions;

by inquiring from external sources such as government agencies, credit reference agencies, database and information service providers or from publicly available data.

Where we are required to collect personal data by law or to perform the Agreement and you do not provide that information when requested, we may not be able to perform the Agreement we have or are trying to enter into with you. In this case, we may need to cancel our Agreement that you have with us, but we will notify you if this is the case at that time.

#### **5. How do we use your personal data and on what basis?**

We will only use your personal data, in a way that we reasonably deem necessary, for the following purposes and on the following legal basis:

The processing is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into a contract with us:

Quotes and information: to answer your questions regarding our Services or to provide you with Service-related information (such as demos and quotes);

Customer engagement: to register you as a customer of ours and to conduct certain background checks to verify whether or not there are potential issues that may mean we are unable to work with a particular person;

Products and services: to provide you with our Services;

Customer management : to carry out the actions related to the management of your account (such as correspondence within the framework of the Agreement, entries in telephone directories, ...);

Administration: agreeing payment arrangements and collecting our fees and costs due to us in connection with the Agreement;

Applicants: to process applications;

Managing supplier relationships: to receive the provision of services from our suppliers (including administration, invoicing and payment). If a supplier helps us provide services to our customers, we will process personal data to manage that relationship.

The processing is necessary to comply with our legal obligations:

compliance processing with respect to financial and tax liabilities;

Data retention: For example, we need to keep your personal data in a suppression file to ensure that there is a record of your objection to direct marketing.

When you have consented to the processing of your personal data:

to send you updates, news about events we organise or participate in, and/or other information about us and the services we and/or our affiliates and/or our trading partners provide that we think may be of interest to you;

to send you details of customer surveys, marketing campaigns, market analysis or other promotional activities;

to collect information about your preferences in order to personalize and improve the quality of our communications with you.

The processing is necessary for the pursuit of our legitimate business interests:

to manage and manage our relationship with you, including accounting, auditing and taking other steps in connection with the performance of our business relationship, including identifying individuals authorized to represent customers, suppliers or service providers;

to carry out background checks, where permitted and when the processing is necessary to prevent fraud; This may include automated verifications of personal information you provide about your identity against relevant databases and contacting you to confirm your identity, or creating records of our communications with you for compliance purposes.

to perform analytics (such as trends, sales intelligence, marketing effectiveness);

to analyze and improve our Services and communications and to monitor compliance with our policies and standards;

to manage access to our premises and for security purposes;

to ensure our network and information security and to prevent or detect security threats, fraud or other criminal or malicious activity;

To identify and contact potential applicants;

for insurance purposes;

to exercise or defend our legal rights or to comply with court orders.

to communicate with you to keep you informed of the latest developments, announcements and other information about Services, events and initiatives (including briefings, newsletters and other information on business and industry developments).

to collect information about your preferences in order to personalize and improve the quality of our communications with you.

For a better understanding of how the Websites are used to improve them regularly or to diagnose technical problems on the Websites.

For statistical purposes in connection with the use of the Services.

To share information between customers and contacts within our service guides.

## **6. Who else has access to your personal data?**

Sometimes we need to share your personal data with third parties. We will only share personal data where permitted by law.

When you provide us with personal information as a customer, we will assume, unless you instruct us otherwise in writing, that we may disclose your personal information in a manner that we reasonably deem necessary to provide our Services (including as described in this Policy), or as required under applicable law.

We share your personal data:

with our affiliates to provide you with services, as described in this policy. You can see more about our group entities [here](#);

With our business partners, service providers and other affiliated third parties: In order for us to provide services to you, we may need to share your personal data with our business partners (including accountants, auditors, bailiffs, lawyers, notaries and authorities, consultants, intermediaries, experts, banks, insurance, software/hardware suppliers, logistics management solutions and system partners). Our agreements with third-party service providers currently include the provision of support services including IT, integrated software solutions, legal accreditation, customer and supplier management, money laundering and terrorist financing controls, credit risk reduction and other fraud and crime prevention purposes, credit check for credit control purposes,

event management, document production, financial, business and legal services, secretarial services, marketing and business development and facility management;

on a confidential basis with third parties to collect your feedback on our services, to help us measure our performance and to improve and promote our services;

with courts, law enforcement agencies, regulators, government officials or lawyers or other parties when reasonably necessary for the establishment, exercise or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution proceeding;

if we sell or buy a business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such businesses or assets to whom we assign or renew any of our rights and obligations;

When disclosure is required by law or regulation: Please note in certain circumstances that we may be required to disclose personal information under applicable laws or regulations, including to law enforcement agencies or in connection with proposed or actual legal process.

When certain Services provide functionality to support Customers' communication needs (e.g., to send a fax/email/SMS through the Services). In these cases, other Users may consult your personal data and add your data to their address book. By using some Services, you understand that the recipient of the communication becomes aware that you are a Customer/User of Teuconnect B.V. and/or may receive some of your personal data collected and processed by Teuconnect B.V.

While using the Services, you may be required to enter transaction information (including details of a freight or transportation operation or the content of email, fax, and text messages,...) for the purpose of communicating it to other parties through the Services. This information will be made available to other parties at your request, according to the rules of the Service.

## **7. International transfers of information**

When we transfer your personal data to other countries, including in territories outside the European Economic Area ("EEA"), we will protect that information as described in this policy.

The legal regimes of some countries outside the EEA do not always provide the same standard of data protection as those within the EEA, although we will ensure that your personal data is only treated in accordance with this policy. We only transfer personal data to these countries when it is necessary for the Services we provide to you, or when it is necessary for the establishment, exercise or defence of legal claims or is subject to safeguards that ensure the protection of your personal data, such as Standard Contractual Clauses approved by the European Commission.

All of our subsidiaries and/or affiliates around the world ensure a level of data protection at least as protective as required in the European Economic Area.

For more information, including obtaining a copy of the documents used to protect your information, please contact us using the contact details below.

## 8. Security of your personal data

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized manner, altered or disclosed. We have entered into strict confidentiality agreements (including data protection obligations) with our third-party service providers.

We also have procedures in place to deal with a personal data breach and will notify you and any applicable regulator of a breach when we are required by law to do so.

## 9. Your rights

You have several rights in relation to our use of your personal data:

- **Access:** The right of access gives you the right to obtain a copy of your personal data. It helps you understand how and why we use your data and verify that we do so lawfully. There are exceptions to this right, so access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are prohibited by law from disclosing such information.
- **Rectification:** You have the right to have incorrect personal data corrected and incomplete personal data completed. We encourage you to contact us using the contact details below to let us know if your personal information is incorrect or has been changed so that we can keep your personal information up to date. We are not responsible for any losses arising from inaccurate, inauthentic, defective or incomplete personal data that you provide to us.
- **Erasure:** You have the right to have your personal data erased. This right is not absolute and only applies in certain circumstances (for example, if your personal data is no longer necessary for the purposes for which it was collected, or if your personal data has been processed unlawfully).
- **Restriction:** You have the right to restrict the processing of your personal data in certain circumstances. This means that you can restrict the way we use your personal data if you have a particular reason for wanting the restriction. This may be because you have problems with the content of the information we hold or how we have processed your data.
- **Portability:** You have the right to request that some of your personal data be provided to you or to another data controller in a commonly used, machine-readable format. This right to data portability only applies where our legal basis for processing this information is consent or for the performance of a contract and we carry out the processing by automated means (i.e. excluding paper files).
- **Object:** You have the absolute right to object to the processing of your personal data if it is for direct marketing purposes. In other specific circumstances, you also have the right to object to the processing of your personal data and to ask us to block, erase and restrict your personal data.
- **Automated individual decision-making:** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects for you or similarly significantly affects you. The right is not absolute and only applies in certain circumstances. You will be specifically informed if we make such an automated individual decision.

- **Complaints:** We are committed to working with you to get a fair resolution to any complaints or concerns about privacy. However, if you believe that we have not been able to help you with your complaint or concern, you have the right to lodge a complaint with a supervisory authority, in the Member State of your habitual residence, of your place of work or of an alleged breach of data protection law (for Belgium see [www.dataprotectionauthority.be](http://www.dataprotectionauthority.be) and for other countries click here). You also have the right to seek a remedy through the courts.

You can exercise any of the above rights at any time by contacting us using the contact details below. If we have any doubts about your identity, we may ask you to provide us with proof of your identity, i.e. a copy of your identity card or passport, or another valid identification document.

## **10. Withdrawal of consent**

Where personal data is processed on the basis of your consent, you may withdraw your consent at any time. Once we have received notice that you have withdrawn your consent, we will no longer process your information for the purpose or purposes for which you originally consented, unless there is another legal basis for the processing.

In the event that you no longer wish to receive marketing communications from us, please use the unsubscribe option (which is included in all our marketing emails to you), or contact us using the contact details below. Withdrawing consent to receive marketing communications does not affect the processing of personal data for the provision of our Services.

## **11. How long do we keep your personal data?**

We will only retain your personal data for as long as necessary to achieve the purposes for which we collected it, including to comply with legal, accounting or reporting requirements and, where required for us to establish or defend legal claims, until the end of the relevant retention period or until the claims in question have been settled.

After the expiry of the applicable retention period, we will securely destroy your personal data in accordance with applicable laws and regulations.

## **12. Cookies**

We use a cookie tool on our website to obtain consent for the optional cookies we use.

Cookies that are necessary for functionality, security and accessibility are set and not deleted by the tool.

You can read more about how we use cookies and how you can change your cookie preferences in our Cookie Policy.

### **13. Links to other websites**

Our websites and social media pages may contain tools, widgets or content that link to other, unaffiliated third-party websites and/or social media pages. Please note that we have no control over or be responsible for the content or privacy and confidentiality practices of third-party websites. You should always carefully review the privacy and confidentiality policies of third-party websites you visit to understand how the operators of those websites may collect, store, and use your personal information.

### **14. Changes to our privacy policy**

We reserve the right to update and amend this policy from time to time to reflect any changes in the way we process your personal data or changing legal requirements. Any changes we make to our policy in the future will be posted on this page and, if applicable, notified to you by email.

This policy was last updated in August 2023. Please check back regularly to stay informed of updates to this policy.

### **15. Language of this Privacy Policy**

Where Teuconnect B.V. has provided you with a translation of the Dutch version of the Privacy Policy, you agree that the translation is provided for your convenience only and that the Dutch versions of the Privacy Policy apply to your relationship with Teuconnect B.V..

If there is a contradiction between what the Dutch version of the Privacy Policy says and what a translation says, the Dutch version takes precedence.

### **16. Contact details**

Questions, comments and requests regarding this policy are welcome and should be directed to the privacy team at:

Teuconnect B.V.

The Hofstede 30

4033 BV Lienden,

Belgium

Email: [privacy@teuconnect.nl](mailto:privacy@teuconnect.nl)

Data Privacy Officer: Willem van Mourik