

## **Privacy Policy concerning the use of the website and the use of cookies**

SMULDERS GROUP<sup>1</sup> understands the importance of the privacy of its customers and the protection of their personal data. Present policy outlines the handling and processing of the personal data we collect.

### **1. Scope**

This website is operated by SMULDERS GROUP. It is important for us that we create and maintain an environment where our customers feel comfortable that their information will not be misused.

We comply with the applicable data protection laws, such as the General Data Protection Regulation 2016/679 and national data protection laws. These data protection laws relate to the protection of your personal data and grants you rights in respect of your personal data.

This policy aims to tell you which personal data we collect from you and how your data will be used following the use of our website to try to ensure you the proper handling of your data.

### **2. What personal data is collected**

You do not have to provide your personal data to us in order to use most of our website.

For the purposes as mentioned hereafter, SMULDERS GROUP may gather and process the following categories of personal data about you when completing forms on our website:

- Name, title;
- E-mail address;
- Company;

Furthermore, we may also collect, and process information obtained through our websites or the devices you are using. This information can be:

- Location data (location information collected from social media networks or IP addresses from your device; GPS signals sent by a mobile device);
- Information from cookies, web beacons or from the internet. This information will be gathered automatically and may be the website that you have visited before browsing our website or the website that you are visiting after ours. We may also collect information on which pages of our website you are visiting, your IP addresses, type of browser, access times, operating system. This information is aggregated and is not used to identify you. You can find out more about how we do that in the articles on the use of cookies;
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<sup>1</sup> As used in this policy, "SMULDERS GROUP" refers to Smulders Group NV, Hoge Mauw 200, Arendonk, and its affiliates Iemants NV, reg. number 0456.528.520, Belgium, Willems Staalconstructies NV, reg. number 0886.535.161, Belgium, Smulders Projects Belgium NV, reg. number 0865.525.060, Belgium, Smulders Projects BV, reg. KVK nr. 17163701 0000, the Netherlands, Smulders Projects International BV, reg. KVK nr. 57932069, the Netherlands, Spomasz SA, reg. NIP PL 9280007159, Poland, Smulders Projects UK Ltd., Hadrian Way, Wallsend NE28 6HL, United Kingdom

SMULDERS GROUP may also collect publicly accessible information in order to verify information we have collected and to manage and expand our business.

### **3. Why do we collect this information**

SMULDERS GROUP collects the abovementioned information to understand your needs and to provide you with a better service, and more specifically we collect your information for the following purposes:

- Your personal data will be used to respond to your (online) queries about our products or services, to provide you with information on our products, and to follow-up online offers;
- Provide the products and services you have ordered;
- Meet legal, regulatory and compliance obligations and requirements;
- Process your personal data for specific purposes as mentioned on specific forms as published on our website, on written notices or via e-mail;
- [...].

### **4. How will your information be used and shared**

SMULDERS GROUP may share your personal data with companies in our group.

Your personal data will not be sold or rented to third parties.

We may disclose your personal data to enforce our policies, to comply with our legal obligations or in the interests of security, public interest or law enforcement in any country where we have entities or affiliates. For example, we may respond to a request by a law enforcement agency or regulatory or governmental authority. We may also disclose data in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests.

In the event that the business of [NAME COMPANY] is sold or integrated with another business, your details will be disclosed to any prospective purchaser's adviser and will be transferred to the new owners of the business. In this case, we will implement the appropriate safeguards to ensure the integrity and confidentiality of your personal data. However, use of your personal information will remain subject to this Policy.

### **5. Transfer of your personal data**

SMULDERS GROUP does not transfer your personal data to third countries located outside the European Economic Area.

### **6. How we use cookies**

Some features of this website are designed to give you a better online experience on our website and will only work if we use cookies. We also use cookies to collect information about your online preferences. Cookies are text files which contain small pieces of information, sent by a web server to a web browser which allows the server to uniquely identify the browser on each page. They will be stored on your computer, tablet or phone when you visit a website.

Cookies may contain identifying information. Cookies enable us to gain information about the use of its websites. This information may be analysed by third parties on our behalf.

**a. We use the following categories of cookies on our website:**

***Performance Cookies***

These cookies collect anonymous information on how people use our Website. For example, we use Google Analytics cookies to help us understand how customers arrive at our site, browse or use our site and highlight areas where we can improve areas such as navigation, shopping experience and marketing campaigns. The data stored by these cookies never shows personal details from which your individual identity can be established.

***Google Analytics***

We also use third party services such as Google Analytics to collect information about visitors to our websites. This information is aggregated to determine number of visits, average time spent, pages viewed, etc. We use this information to measure site usage, as well as to improve the content and value of our site. More information about the way Google processes your information is here – [https://www.google.com/analytics/terms/dpa/dataprocessingamendment\\_20160909.html](https://www.google.com/analytics/terms/dpa/dataprocessingamendment_20160909.html). If you wish to disable Google Analytics on your browser, please follow <https://tools.google.com/dlpage/gaoptout?hl=en>.

**b. Deletion of cookies and more information about cookies**

Some cookies are deleted when you close down your browser (session cookies). Others remain on your device until they expire or you delete them from your cache (persistent cookies or tracking code) and enable us to remember things about you as a returning visitor.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. The help option on the toolbar of most browsers will also tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Please bear in mind that some personalized services may not be available if you choose to disable cookies.

Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site.

To find out more about cookies please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org) or see [www.youronlinechoices.eu](http://www.youronlinechoices.eu) which contains further information about behavioural advertising and online privacy.

**c. Web beacons**

Some of our Web pages may contain electronic images known as Web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. We may also carry web

beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

## **7. Rights of Data Subjects**

You are entitled to see the information held about you and to obtain a copy of the information we hold. If your personal data have been changed, you are entitled to ask us to rectify or complete or erase the outdated, incorrect or incomplete data we have about you. Furthermore, you have the right to restriction of the processing of your data and to object to the processing of your personal data. You have also the right to data to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

If you have opted to receive commercial e-mails and/or newsletters from SMULDERS GROUP at the time you registered on the website, you may opt-out whenever you have changed your mind.

We may require you to provide verification of your identity to ensure that you have a legitimate right to make the request and to verify that we provide the answer to the person that has the legitimate right to send us one of the abovementioned requests and to obtain the information.

Please note that in certain circumstances as provided by law we may withhold access to your information or that we may not grant your request where we have the right to do so under applicable data protection legislation.

If you wish to obtain more information regarding the processing of your personal data or if you wish to exercise your rights, please contact us at [privacy@smulders.com](mailto:privacy@smulders.com)

You have the right to lodge a complaint with the competent supervisory (data protection) authority.

## **8. Security**

SMULDERS GROUP is committed to trying to make sure that your information is secure. We have implemented reasonable technical and organisational measures to secure your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. You should, however, remember that the internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal data for improper purposes.

This website may contain links to third party websites. SMULDERS GROUP is not responsible for the content of these websites and is not responsible for the privacy standards and practices of that third party. We recommend you read and understand the relevant privacy policies of these third parties and their websites before you accept their cookies and visit their website to ensure yourself that your personal data is sufficiently protected.

## **9. Changes to this policy**

SMULDERS GROUP may amend and update this policy from time to time to ensure that the policy represents the way we process your personal data at that time. We will place an updated

version of this policy on the same webpage and will automatically be effective when published. Please return to this webpage regularly to ensure that you are always aware of the information we collect and process, how your data is being used, in which circumstances, and in which cases we will share your data with third parties.