

MEGA FORTRIS BNL B.V.

**CUSTOMER/WEBSITE
PRIVACY NOTICE**

INTRODUCTION

This Privacy Notice is provided by Mega Fortris BNL B.V. ('Mega Fortris', 'we' or 'us') who is a 'controller' for the purposes of the Data Protection Laws. This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share data about you. We are required to notify you of this information under the Data Protection Laws. In this notice, references to 'data subject' means you.

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our processing and your rights. In this notice, references to 'data subject' means you.

HOW TO CONTACT US

For any questions or issues in relation to this Privacy Notice, please contact our Privacy Team using the details below:

- Privacy Officers: Linda Witteman
- Address: Laan van Verhof 49, 2231 BZ Rijnsburg, Netherlands Telephone number: +31 (0) 85 006 5330
- Email address: L.Witteman@megafortris.com

CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time. The latest version will be available at www.megafortris.nl

Current version: 1

WHO DOES THIS PRIVACY NOTICE APPLY TO?

This Privacy Notice applies to personal data collected from the following people:

Website visitors	If you browse our website, contact us with an enquiry or a complaint through our website, we will collect and process your personal data in connection with your interaction with us and our website.
Mega Fortris customers	If you are a potential or current customer, we will collect data from you in order to provide you with quotations, process your orders, take payment for your orders, send you emails about offers we might have on and to record your interactions with Mega Fortris.
Visitors to our offices or operating facilities	If you attend our office or operations facilities, we may process personal data that you volunteer in connection with

	your visit and any enquiries you make. For example, you may volunteer personal data when signing in as a guest.
Event Attendees	If we interact with you at a conference or exhibition, we will process personal data about you in connection with your attendance at the event and so that we can provide you with more information about our products after the event.

WHAT PERSONAL DATA DO WE COLLECT?

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include anonymised data.

We may collect the following personal data about you in the course of our interactions with you:

Identity Data	This includes your name, business email address and telephone number and a record your interactions with our business (such as whether you have received or opened our mailshots).
Payment Details	We require payment details in order to process your order. If you are sole trader, these payment details will be your personal data.
Cookies	<p>A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our website. We use cookies and other similar tracking technologies e.g. web beacons, action tags, on our website. We do this, amongst other reasons to monitor, for example:</p> <ul style="list-style-type: none"> (i) How many times you visit the website; (ii) the pages you visit when you're on the website; and (iii) your bandwidth so that we can make sure you're accessing the correct interfaces to view the video content we upload on to our website. <p>This information helps us build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individual.</p> <p>For further information on our use of cookies, please see our Cookies Policy which can be found on our website. If you would like more information as to what a cookie is and what</p>

	they do, please click here . If you want to know how to remove them from your browser, please click here .
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HOW WE COLLECT DATA

We collect and receive personal data using different methods, including but not limited to:

Personal data you provide to us	You may give us your personal data directly. This will be the case when, for example, you contact us through our website or telephone number or provide your information to us at an event.
Personal Data we generate about you	We may generate personal data as a result of our interactions with you, such as providing you with quotations, processing your orders, sending you emails about our offers and allocating your payments. We also record your interactions with us, such as whether you have received or opened up our mailshots.
Personal data received from third parties	From time to time, we will receive personal data about you from third parties so that we can ascertain the financial standing of customers before proceeding with an order. We will only obtain this information where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal data to us.
Payment data	In the course of payment, we may receive personal information about you from the banks and payment gateways we use.

PERSONAL DATA ABOUT OTHER INDIVIDUALS

If you give us information on behalf of someone else, you must confirm that the other person has appointed you to act on his/her behalf and has given their consent.

SENSITIVE PERSONAL DATA

Certain categories of personal data are classified as 'special categories of data' and require higher levels of protection, such as information regarding your ethnic or racial origin, political affiliations or health data. We do not process any information relating to you which would be considered to be special category data.

WHY DO WE NEED YOUR PERSONAL DATA?

We have set out below how we may use your personal information and what our legal basis is for being able to use your personal data in each way:

HOW WE USE YOUR PERSONAL DATA	LEGAL BASIS FOR PROCESSING
<ul style="list-style-type: none"> • Complying with health and safety regulations • Dealing with legal disputes involving our customers • Accounting and auditing purposes • Making repairs, alterations and improvements (to this website or to our products) • Carrying out necessary anti-money laundering checks on our customers. 	<p>So that Mega Fortris can comply with its legal obligations</p> <p>Legitimate interest</p>
<ul style="list-style-type: none"> • Providing our customers with the products requested and deal with invoicing and payment • Dealing with any complaints our customers may have in accordance with our complaints procedure • Assessing financial, reputational, credit or insurance risks arising from any relationships or prospective relationship with our customers • Sending customers service-related communications and dealing with communications from customers • Processing and delivery of customer orders and allocation of payments 	<p>Processing of this data is necessary in order to allow us to enter into and perform a contract</p>
<ul style="list-style-type: none"> • Contacting you directly via email, telephone, email, SMS or other electronic messaging service with offers relating to our products or information that may be of interest to you 	<p>Your explicit consent (where applicable)</p> <p>Legitimate interest</p>

<ul style="list-style-type: none"> • To inform you about important changes to Mega Fortris or our or policies • To conduct background checks in accordance with our internal requirements (where permissible and in accordance with applicable law.) 	<p>We are carrying out this processing to pursue legitimate interests of our own work or those of third parties (i.e. we have good, sensible, practical reasons for processing your personal data which is in the interests of Mega Fortris or a third party).</p>
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LEGAL BASIS FOR PROCESSING PERSONAL DATA

We have set out below a description of the legal basis upon which we process your personal data:

- Contract (article 6(1)(b) GDPR): We process some personal data in order to comply with our contract with you.
- Necessary for our legitimate interests (article 6(1)(f) GDPR): We process some personal data if doing so is in our legitimate interests. In order to do so, we have considered the impact on your interests and rights, and have put in place appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You have the right to object to the processing of your personal data on this ground. See section headed 'Your Rights' to find out how.
- Necessary for the compliance with a legal obligation (article 6(1)(c) GDPR): We may have to process some of your personal data in order to comply with certain legal obligations.
- Consent (article 6(1)(a) GDPR): You have given your explicit consent for us to process your personal data for direct marketing purposes.

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

We will, in certain circumstances, disclose your personal information to the following recipients:

PERSONAL DATA	WHO THE DATA IS SHARED WITH
Delivery information, including customer contact details	We share this information with delivery companies and couriers to facilitate the delivery process.
Name, phone number, email address and delivery address	We share this information with an external service providers, such as our customer relationship management system, SAGE, for the purpose of storing and processing customer-related quotations, orders and sales information.

Financial information	We share this information with organisations involved in the payments systems including financial institutions, merchants and payment gateways.
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If you would like to know more information as to who will have access to your data, please contact our Privacy Team.

TRANSFERS OF YOUR PERSONAL DATA OUTSIDE OF THE EEA

Data may be held at our offices and by third party service providers, representatives and agents as described above. We share corporate and financial information with our parent company, Mega Fortris Sdn Bhd in Malaysia, which may include your personal data. All transfers of personal data are carried out in accordance with the Data Protection Laws to ensure that personal data receives an adequate level of protection and is treated in a way that is consistent with and respects the Data Protection Laws. Please contact our Privacy Team for further information.

KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors or other third-parties who have a business need to know. They will only process your personal information on our instructions.

We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. Our server backups are protected to AES-256 encryption standards.

While we use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the integrity and security of any personal data that is transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us.

WHEN WILL WE DELETE YOUR DATA?

We will retain your personal data in accordance with our Data Retention Policy. Customer data, including contracts will usually be retained for a period of two years, unless we have a legal obligation to retain such data for longer periods. Please contact us if you would like further information.

YOUR RIGHTS AS A DATA SUBJECT

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

As a data subject, under certain circumstances, by law you have certain rights:

- the right to object to processing of your personal data;
- the right of access to personal data relating to you (known as data subject access request);
- the right to correct any mistakes in your information;
- the right to ask us to stop contacting you with direct marketing;
- the right to restrict your personal data being processed;
- the right to have your personal data ported to another controller;
- the right to withdraw your consent;
- the right to erasure; and
- rights in relation to automated decision making (please note, we don't carry out any automated decision making so these rights will not apply).

These rights are explained in more detail below. If you want to exercise any of your rights, please contact us.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

Please be aware that there are some exceptions and exemptions that apply to some of the rights which we will apply in accordance with the Data Protection Laws.

Right to object to processing of your personal data

- You may object to us processing your personal data where we rely on a legitimate interest as our legal basis for processing.
- If you object to us processing your personal data we must demonstrate compelling grounds for continuing to do so. We believe we have demonstrated compelling grounds in the section headed "Why do we need your personal data".

Right to access personal data relating to you

You may ask to see what personal data we hold about you and be provided with:

- a copy of the personal data;
- details of the purpose for which the personal data is being or is to be processed;

- details of the recipients or classes of recipients to whom the personal data is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers;
- the period for which the personal data is held (or the criteria we use to determine how long it is held);
- any information available about the source of that data; and
- whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

To help us find the information easily, please provide us as much information as possible about the type of information you would like to see.

Right to correct any mistakes in your information

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please let us know what information is incorrect and what it should be replaced with.

Right to restrict processing of personal data

You may request that we stop processing your personal data temporarily if:

- you do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
- the processing is unlawful but you do not want us to erase your data;
- no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
- you have objected to processing because you believe that your interests should override our legitimate interests.

Right to data portability

You may ask for an electronic copy of your personal data which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

Right to withdraw consent

For the uses of data specified in this Privacy Notice as needing your consent, you have the right to withdraw consent you have given us at any point. This is a vital and necessary aspect of consent. To withdraw your consent, you can contact us at the details in the 'How to contact us' section. Note that any processing carried out prior to the date of withdrawal of your consent will still be valid and any published personal data cannot be retracted.

Right to ask us to stop contacting you with direct marketing

You can ask us to stop contacting you for direct marketing purposes. If you would like to do so, please:

- Email, call or write to us. You can also click the 'unsubscribe' button at the bottom of our direct marketing communication.
- Provide us with details of your preferred method of contact (e.g. you may be happy for us to contact you via email and not by telephone).

Right to erasure

You can ask us to erase your personal data where:

- you do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data;
- you object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
- your data has been processed unlawfully or have not been erased when it should have been.

Rights in relation to automated decision making

We do not make any automated decisions about you so these rights do not apply.

WHAT WILL HAPPEN IF YOUR RIGHTS ARE BREACHED?

You may be entitled to compensation for damage caused by contravention of the Data Protection Laws.

COMPLAINTS TO THE REGULATOR

It is important that you ensure you have read this Privacy Notice and, if you do not think that we have processed your data in accordance with this notice, you should let us know as soon as possible. We hope that we can resolve any query or concern you raise about our use of your personal data. If not, contact the Dutch Data Protection Authority ("*Autoriteit Persoonsgegevens*") at <https://www.autoriteitpersoonsgegevens.nl/een-tip-of-klacht-indienen-bij-de-ap> or telephone: 088-1805250 for further information about your rights and how to make a formal complaint.