



*Dated November 21<sup>st</sup>, 2018*

## **Online Privacy Policy**

At Verbruggen Juice Trading Sustainable Products B.V., we are committed to protecting the confidentiality, accuracy and integrity of any personal data you provide to us. We always strive to safeguard such data from misappropriation, loss, misuse, unauthorized access, disclosure and/or alteration. We only collect personal data that is relevant for our described purposes.

This privacy statement applies to any processing of personal data on [www.vjfsp.com](http://www.vjfsp.com) which is hereinafter referred to as the “Website”.

### **Scope**

This Online Privacy Notice has been created for all website users, suppliers and customers to provide relevant information and demonstrate that your personal data is processed in a legal and responsible manner.

However, information in grey is only applicable only where Regulation EU 2016/679 (GDPR) applies to you. The GDPR applies to you where the processing of your personal data is done in the context of the activities of a relevant establishment in the Union, or where the offering of goods or services, or the monitoring of your behavior, has occurred and you are in the Union.

### **Processing**

Shall mean any operation which is performed on personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **How we process your personal data**

Personal data automatically collected when you browse the Website

When you visit the Website for informational reasons, i.e. without being registered, we will automatically gather and store certain information (e.g. device type, the browser used, the date and time of visit, pages visited).

We use such data only to assist us in providing an effective service (e.g., to adapt our website to the needs of your end user device or to improve our website ). The personal data collected is necessary to provide you with the website. The legal basis for this processing activity is Article 6 (1) 1 lit. b of the European General Data Protection Regulation (“GDPR”).

### **Registration for our services**

We will process personal data actively provided by you, e.g. when you register with us by setting-up a contact record, sending us requests or questions or place orders. Such personal data may contain inter alia your name, e-mail address, contact details, company affiliation, country, request and order information.



Verbruggen Juice Trading Sustainable Products B.V. collects and uses personal data only to provide you with the services you requested, to administer your contact record, identify you and to communicate with you. We also interact with you via our general enquiry sections or responding to complaints or general feedbacks given by you on our services or because we had or have a contract with you in place.

We use the personal data and contact data you provide to us to inform you directly about our additional products and services. This concerns data you provide to us personally. We do not gather data for advertising through our website. The use of your personal data for directly advertising related products and services is a legitimate interest for us as a provider of this website, Article 6 sec. 1 sent. 1 lit. f GDPR.

You can object to the use of your personal data for direct marketing at any time. We will then refrain from any processing to the extent it is related to such purposes. You can inform us about your objection by sending an e-mail with your request to [info@vjfsp.com](mailto:info@vjfsp.com)

### **Data collected from third party sources**

Your personal data will be disclosed to the following parties:

#### Group internal recipient

Your personal data may be transferred to various entities within our Group. Our group consists of Vero-Bio Group B.V. , Vero-Bio B.V. and Verbruggen Juice Trading Sustainable Products B.V.. The legal basis for such transfer is our group's legitimate interest in the provision of a shared custom support, administration and internal IT department as well as our company group's legitimate interest to guarantee smooth operations between our entities for the purposes set out above.

#### Third party recipients

We engage third party companies and individuals who assist us in providing the services we offer through this website. Your personal data will be disclosed e.g. to the following third parties and partly their sub-processors:

- Webbureau Safira – Our webhost and designer

Therefore, our contractors will only use your personal data to the extent necessary to perform their functions and will be contractually bound to process your personal data only on our behalf and in compliance with our requests.

We may disclose your personal data if legally entitled or required to do so (for example if required by law or by a court order). The legal basis for this processing is Art. 6 (1) 1 lit. C GDPR.



## **Retention periods**

We strive to keep our processing activities with respect to your personal data as limited as possible. In the absence of specific retention periods set out in this policy, your personal data will be retained only for as long as we need it to fulfil the purpose for which we have collected it and, if applicable, as long as required by statutory retention requirements.

## How we use cookies

The Website uses cookies. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of the Website which helps us to provide you with a good experience when you browse our Website, and to improve our Website.

A cookie can be classified by its lifespan and the domain to which it belongs. By lifespan, a cookie is either a:

- session cookie which is erased when the user closes the browser or
- persistent cookie which remains on the user's computer/device for a pre-defined period of time.

As for the domain to which it belongs, there are either:

- first-party cookies which are set by the web server of the visited page and share the same domain
- third-party cookies are stored by a different domain to the visited page's domain. This can happen when the webpage references a file, such as JavaScript, located outside its domain.

## The cookies we use allow us to see:

- The Internet domain and Internet Protocol (IP) address from which you access our Website;
- The date and time you visit our Website;
- The pages you visit on our Website;
- If you linked to our Website from another website, the address of that website; and

If you were referred to our Website from a search engine, the address of that website and the search term you used to find us. Any data processing that occur while using cookies used for the sole purpose of carrying out the transmission of a communication and/or strictly necessary to perform the services you required is based on Article 6 (1) lit. b GDPR.

In case personal data is processed in the course of using cookies and/or similar technologies that are used for other purposes, e.g. improving our website or marketing purposes, the processing is based on Article 6 (1) lit. f GDPR and represents our legitimate interest in maintaining our user base, bringing new users to the Website and informing (potential) users about products and services provided by Verbruggen Juice Trading Sustainable Products B.V..

You can control and/or delete cookies as you wish – for details, see [www.allaboutcookies.org](http://www.allaboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit the Website.



## Google Analytics

This Website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help us analyse how users use the site. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

The Website uses Google Analytics' IP anonymisation function. Google will truncate/anonymise the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On our behalf, Google will use this information for the purpose of evaluating your use of the Website, compiling reports on Website activity and providing other services relating to Website activity and internet usage to us. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser.

Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en>. An opt-out cookie will be set to prevent the future collection of your information when you visit this Website.

Further information can be found under <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

Our website does not track your online activity after leaving our website nor is the information collected by our website used for advertising purposes.

## **Security**

We take market standard precautions to protect personal data. When our contact form asks users to provide personal data, that personal data is encrypted and is protected with market standard encryption software. While on a secure page, the lock icon on the top of web browsers such as Microsoft Internet Explorer is present.

Unfortunately, no data transmission or processing can be guaranteed to be 100 % secure. Accordingly, despite our efforts to protect the personal data, Verbruggen Juice Trading Sustainable Products B.V. is not in a position to guarantee or warrant the security of the personal data.

## **Personal data rights**

### Your rights

There are many things you can do in relation to our processing of your data. You can use [info@vjfsp.com](mailto:info@vjfsp.com) to contact us to request:

- *Access to your data*; You have the right to request information as to whether we are processing personal data concerning you and subsequent access to this data.
- *Rectification of your data*; You have the right to the rectification of your personal data if that is incorrect or incomplete.



- *Erase your data*; You have the right to request us to erase your personal data, where no exemption for retaining the personal data applies.
- *Restriction of our processing of your data*; You have the right to request a restriction on the processing of your personal data in particular circumstances.

#### Legal actions

You have the right to take legal action in relation to any breach of your rights regarding the processing of your personal data, as well as to lodge complaints before the competent data protection regulators.

#### Comments

All comments relating to this notice and / or regarding your personal data should be directed to [info@vjtsp.com](mailto:info@vjtsp.com).

#### **Revision of the Privacy Statement**

Verbruggen Juice Trading Sustainable Products B.V. may change or update the privacy statement without notice. All such changes will take effect once they have been posted on the Website. It is your responsibility to monitor such updates. The privacy statement was last updated on the date stated at the beginning of this privacy statement.

Thank you for your visit to our website!

#### **Verbruggen Juice Trading Sustainable Products B.V.**

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