

GENERAL PRIVACY POLICY B.I.G.

This privacy policy (hereinafter: “**Privacy Policy**”) governs the processing of your personal data by Beaulieu International Group N.V. and its affiliates as part of your communication with us via e-mail, telephone, fax and social media (hereinafter: “**Social Media Channels**”; e.g. Facebook, LinkedIn, Twitter, Pinterest, TikTok, WeChat and Instagram), your visit to our and our affiliates’ websites (hereinafter: “**Websites**”), in relation to any order or purchase made by you and any of our events or visits to our premises you have participated in.

NOTE 1: This Privacy Policy does not apply to the processing of personal data of people who choose to apply via our jobsite/Successfactors website. The processing of personal data of applicants via the jobsite/Succesfactors website is governed by a separate privacy policy, which is made available on that website.

NOTE 2: If you want information on how we process personal data via cookies, social plug-ins, pixels and other types of tracking technology, you are kindly referred to our Cookie Policy: <https://dam.bintg.com/brochure/0065a78c-211e-4d48-85a2-0c4c31a9fdb9>

1. IN GENERAL

- 1.1. Your personal data are processed by Beaulieu International Group N.V., Kalkhovestraat 16 bus 0.1, 8790 Waregem, Belgium with corporate registration number 0442.824.497, RPR Ghent, Kortrijk division and its affiliates (hereinafter: “**B.I.G**”, “**we**”, “**us**”, “**our**”). You can contact us via e-mail at privacy@bintg.com.
- 1.2. Any notion starting with a capital shall be defined by explicit reference in this Privacy Policy. Where possible given the context, singular words shall be interpreted as also including the plural and vice versa.
- 1.3. B.I.G. explicitly confirms that all personal data will be processed in accordance with both the Belgian act of 30 July 2018 on the protection of individuals with regard to the processing of personal data and Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter “**GDPR**”). Where reference is made to certain laws or regulations, such reference shall also include any change, replacement or annulment of said laws or regulations, including any related executive decisions.
- 1.4. B.I.G. reserves the right to modify, change or amend this Privacy Policy from time to time at its own discretion. We thus advise you to check this Privacy Policy regularly on our Websites. If you do not accept the modifications, changes or amendments, you are to inform us by sending an e-mail to privacy@bintg.com. If we do not receive such an e-mail from you within three (3) business days after the changes to the Privacy Policy have been announced on our Websites, you will be deemed to have unambiguously accepted all such changes.

2. TYPES OF PERSONAL DATA WE PROCESS

2.1. Personal data can be defined as any information relating to an identified or identifiable individual. B.I.G. might process the following data:

- Your identification information such as your name, surname, date of birth, job title/position, picture, (financial) account number,...;
- your contact details such as your postal address, e-mail address, phone number;
- records of correspondence with us, your preferences and responses to our surveys;
- data collected by automatic means such as cookies and other tracking devices.

3. PURPOSE FOR PROCESSING

3.1. B.I.G. first and foremost processes your personal data, acting as a data controller, to manage our (contractual) relationship. To this end, we process your personal data for the purpose of:

- Processing orders and supplying the products you ordered;
- Answering your questions or other requests;
- Managing product claims, organising our legal defence,...
- Sending direct marketing of the B.I.G. group about products that might be of interest to you (it being understood that if you are not an existing customer who has already purchased similar goods or services from us, we will only do so with your explicit consent);
- Registering visitors to our buildings, Websites and showrooms;
- Analysing data and creating (marketing) statistics to improve our services and offerings to our clients. Where possible, we will do this in a pseudonymized manner;
- Improving technical and functional management of our Websites;
- The organisation of contests or events.

3.2. B.I.G. might also process your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities.

4. LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA

4.1. GDPR allows us to process personal data, so long as we have a processing ground under the law to do so. We therefore will process your personal data on the following lawful basis, taking into consideration the purpose of the processing outlined above:

- it is necessary for the **performance of a contract**, with you, whether as a client or

a supplier;

- we have received your **consent** to do so. This consent may be withdrawn at any time by sending contacting us at privacy@bintg.com;
- it is necessary to pursue our **legitimate interest** (be it the effective delivery and improvement of our services, the protection and operation of our business, the exercise, establishment or defense of a legal claim,...) so long as such interests are not outweighed by your interests;
- it is required on the basis of **legal and regulatory obligations** we are subject to.

4.2. We will only be processing special categories of personal data when (i) you have given your explicit consent to process such data; (ii) such information is required or permitted to be collected by (employment, social security/protection or other) law or professional standards; (iii) this processing is necessary for the establishment, exercise of defense of legal claims or (iv) you have made this data public. We therefore kindly ask you to use your discretion when providing us with special categories of personal data and only do so if you explicitly consent to B.I.G.'s use of that information for its legitimate business purposes.

4.3. Given the importance of protecting children's privacy, B.I.G. does not intend to collect children's personal data and its sites are not designed for nor directed at children.

5. RECIPIENTS

5.1. We will only disclose the personal data with parties that have a need to know for the purposes listed in article 3 above. B.I.G. does not send your personal data in an identifiable manner to any third party except (i) with your explicit permission to do so; (ii) for our legitimate and professional business interests and/or (iii) where required or permitted by law to do so. By agreeing to this Privacy Policy, you accept that we may share your personal data with:

- other **entities and business units within the B.I.G. group of companies**. However, we will ensure that all B.I.G. group entities will take due care that all processing of your personal data is in line with what is set out in this Privacy Policy;
- **third party processors** (for example: payment services providers, software- or IT service providers, hosting and maintenance providers, marketing agencies, mailing vendors,...) to process your personal data on our behalf in the framework of the purposes stipulated in article 3. These third party processors are only allowed to process your personal data on behalf of B.I.G. upon explicit written instruction of

B.I.G. and we will ensure that sufficient safeguards for the protection and confidentiality of your personal data are in place;

- **third party vendors** (distributors, agents, dealers, retailers, installers,...) that may offer services in relation to our own products and services;
- **Public authorities** (courts, tribunals, law enforcement, public or regulatory bodies,...) in order to respond to their request or orders or if necessary to comply with applicable law and insofar as permitted by such law;
- Acquirers of our business or as part of a **corporate transaction**.

5.2. B.I.G. warrants that it will limit the disclosure to the personal data that is strictly necessary to fulfill the purposes listed in article 3 above.

6. LOCATION AND TRANSFER

6.1. B.I.G. processes your personal data first and foremost within the EEA. However, in order to process your personal data for the purposes outlined in article 3 above, we may also transfer your personal data to other entities within B.I.G. group or to third parties who process on our behalf and which are located outside the EEA. Each entity outside the EEA that processes your personal data, shall be bound to observe adequate safeguards with regard to the processing of your personal data. Such safeguards could be the consequence of:

- the recipient country having legislation in place which may be considered equivalent to the protection offered within the EEA (adequacy decision under article 45 GDPR); or
- of a contractual arrangement between B.I.G. and that entity based on the EC's Standard Contractual Clauses as foreseen by article 46.2; or
- any other appropriate safeguard as foreseen under articles 44 to 48 GDPR.

6.2. B.I.G. may also transfer anonymized and/or aggregated data to organizations outside of the EEA.

7. DATA SECURITY ASSURANCE

7.1. B.I.G. will only process only those personal data that are necessary to achieve the purposes listed under article 3 (data minimalization).

7.2. Your personal data are only processed and kept for as long as needed to achieve the purposes listed under article 3 of this Privacy Policy or for as long as necessary to comply with applicable legislation or to handle a dispute.

B.I.G. will de-identify your personal data when they are no longer necessary for the purposes outlined in article 3, unless there is (i) an overriding interest of B.I.G. in keeping your personal data identifiable or (ii) a legal or regulatory obligation or a judicial or administrative order that prevents B.I.G. from de-identifying them.

- 7.3. B.I.G. will take the appropriate technical and organizational measures to keep your personal data safe from unauthorized access or theft as well as accidental loss, tampering, disclosure or destruction. To this end B.I.G. has adopted several procedures which are implemented within the company.

Access by personnel of B.I.G. will only be on a need-to-know basis and subject to strict confidentiality obligations. B.I.G. will also make sure its personnel will receive the necessary training and education to make sure they are aware of their obligations when handling your personal data.

You understand, however, that safety and security are best efforts obligations only, which can never be absolutely guaranteed.

8. YOUR RIGHTS

- 8.1. You have the right to **request access** to all personal data processed by B.I.G. pertaining to you, including the purposes for which they are processed and the estimated retention period. Before providing this information to you, we may ask for proof of identity and the exchanges we had with you in order to locate your personal data. In case we agree that we are required to provide you with this personal data, we will do so free of charge. B.I.G. however reserves the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to B.I.G.
- 8.2. You have the right to ask that any personal data pertaining to you that are inaccurate, are **corrected free of charge**. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.
- 8.3. To the extent the lawful basis of us processing your personal data is consent, you have the right to **withdraw** your earlier given **consent** for processing your personal data. This will of course not affect the legitimacy of the processing done prior to this withdrawal of consent.
- 8.4. You have the right to **request that personal data** pertaining to you **be deleted** if they are no longer required in light of the purposes outlined in article 3 or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by B.I.G. against:
- overriding interests of B.I.G. or any other third party;
 - legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

- 8.5. Instead of deletion, you can also **request** that B.I.G. **limits the processing** of your personal data if and when for example you contest the accuracy of that data, the processing is illegitimate, the data are no longer needed by B.I.G. for the purposes listed under article 3, but you need them to defend yourself in judicial proceedings, etc. In such case, we will temporarily move your personal data to another processing system or make it unavailable to users in any other way. Once we made a decision concerning the reasons for your request to limit the processing, we may decide to lift the restriction after we notified you hereof.
- 8.6. You have the right to **object the processing** of personal data if you are able to proof that there are serious and justified reasons connected with his particular circumstances that warrant such objection. If these particular reasons outweigh our interests to process your data we will terminate the processing activity. However, if the intended processing qualifies as direct marketing, you have the right to oppose such processing without justification or possibility for us to object.
- 8.7. You have the **right to data portability** in case the lawful basis for the processing of your personal data is consent or the performance of a contract. In such case we will provide you or another controller of your choosing with the personal data you have provided to us in a structured, commonly used and machine-readable format.
- 8.8. You have the right to **request not to be subject to profiling**. As explained in article 3 B.I.G. may use your personal data to create marketing statistics. You have the right to object to this profiling for direct marketing purposes without having to give a specific reason.
- 8.9. If you wish to submit a request to exercise one or more of the rights listed above, you can send an e-mail to privacy@bintg.com. An e-mail requesting to exercise a right shall not be construed as consent with the processing of your personal data beyond what is required for handling your request. Such request should clearly state which right you wish to exercise and the reasons for it, if such is required. It should also be dated and signed. As explained above, we may ask for proof of identity for privacy and security reasons before addressing this request.

B.I.G. will promptly inform you of having received this request. If the request proves valid, B.I.G. shall honor it as soon as reasonably possible and at the latest thirty (30) days after having received the request.

If you have any complaint regarding the processing of your personal data by B.I.G., you may always contact B.I.G. via the e-mail address listed above or via mail to:

Beaulieu International Group NV
Privacy Office
Kalkhoevestraat 16 box 0.1

8790 Waregem
Belgium

If you remain unsatisfied with B.I.G.'s response, you are free to file a complaint with the competent data protection authority, i.e. the Belgian data protection authority. For more information, visit <http://www.gegevensbeschermingsautoriteit.be>.

9. MISCELLANEOUS

- 9.1. When you visit the pages B.I.G. has on its different Social Media Channels, your data will be transmitted to the operators of these respective Social Media Channels through the use of cookies. These Social Media Channels may receive personal data about you such as for example your IP-address or the websites you have previously visited. When you visit these pages B.I.G. may also receive aggregated data from these Social Media Channels in the form of statistics on how our pages are viewed by visitors hereof. For more information on the scope, purposes and processing of your personal data by these Social Media Channels, we kindly refer to the privacy policies of the respective Social Media Channels themselves.
- 9.2. Do note that the B.I.G. Websites may contain links to other sites, including sites that are not governed by this Privacy Policy. We therefore always advise you to review the privacy policy of these sites before disclosing any personal data.
- 9.3. B.I.G. reserves the right to modify this Privacy Policy from time to time to reflect our current and new privacy practices. We will always post the updated version on our Websites, including the version number of this last update. We therefore encourage you to regularly check this Privacy Policy to remain informed on how B.I.G. is protecting your personal data. Any significant changes to this Privacy Policy will be made clear via our Websites.

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