

# PRIVACY POLICY

## GENERAL EXPLANATION

This website is the property of Domation bv, with registered office located at Duivelshoekweg 2, 2610 Antwerp, Belgium and with company number BE 0842.298.213 (hereinafter referred to as 'ELUXO').

ELUXO is committed to the protection of your personal data and is committed to the privacy of the users of its website, its customers and its contacts. This means that everything possible is done to protect your privacy as much as possible and ensure that you can trust us with your data with peace of mind, without it being misused.

ELUXO therefore treats your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 and repealing Directive 95/46/EC (the General Data Protection Regulation, hereinafter: GDPR) and Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

During your visit to our website, when we carry out an order for you or we communicate with you, you may share personal information with us so that we can not only identify you as an individual (e.g. your surname and first name, your email address, your home address, your landline or mobile phone number, etc.) but also answer your questions or provide services. These are the personal data discussed below. By using our website [www.eluxo.be](http://www.eluxo.be) and/or our services, you unconditionally accept this privacy notice as well as the general terms of use.

## WHAT IS MEANT BY 'PROCESSING OF DATA' AND WHO IS RESPONSIBLE FOR IT RESPONSIBLE?

This term refers to any kind of handling of personal data. This term includes any operation or set of operations involving personal data or sets of personal data, whether or not carried out by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

Personal data is processed through this website and other ways in which ELUXO may receive such data, such as email, correspondence or registration forms.

ELUXO is responsible for processing your personal data.

## PURPOSES AND LEGAL BASIS OF PROCESSING YOUR PERSONAL DATA

Personal data is processed on the basis of Article 6.1 GDPR. ELUXO

processes your personal data for the following purposes:

- Taking measures to verify your (personal) data when logging in to your account on the website and shop, as well as making arrangements to secure your personal data;
- Checking the status of 'enterprise', i.e. checking the data in the Crossroads Bank of Enterprises;
- Proceeding to the delivery and invoicing of the products/services offered through our website or by any other means;
- Checking your creditworthiness or that of your company;
- The technical administration of our website and shop, as well as the management of our customer records.

In addition, ELUXO processes your personal data if this is necessary for the protection of our legitimate interests or those of a third party, including in the case of the following purposes:

- The exercise of fundamental rights, including taking legal action, whether by us or a third party;
- Providing up-to-date information on possible offers or new offerings, whether or not based on pseudonymised user profiles;
- Personalised advice including by sending newsletters, by creating pseudonymised user profiles where we personalise our offers based on your browsing behaviour;
- Verifying the status of 'enterprise';
- Checking your creditworthiness or that of your company;
- Preventing fraudulent use of our website and shop;
- Prospecting and marketing.

Furthermore, by agreeing to this privacy notice, you give us your consent to process your personal data for the following purposes:

- Contacting you in order to answer your question or comment, whether by email or telephone;
- Providing up-to-date information on possible offers or new offerings, whether or not based on pseudonymised user profiles;
- After making the personal data anonymous, statistics are compiled regarding the number of visits to the various sections of the website;
- Handling your application;
- To offer or perform our services to you;
- For any other purposes for which you have given your consent.

If ELUXO seeks to carry out any processing of your personal data for a purpose not provided for in this privacy notice, we will contact you at the email address you provided to inform you of this new processing and its purpose. You will of course have the option to refuse this processing.

The legal grounds on the basis of which ELUXO processes your personal data are the following:

- The consent we have obtained from you to process your personal data;
- Necessity for the performance of a contract to which you are a party;
- The necessity to comply with a legal obligation incumbent on us;
- The necessity to protect your vital interests or those of another natural person.

Please note that certain functionalities of our website may not be available if you do not wish to communicate your personal data or refuse the use of certain cookies.

You always have the right to withdraw your given consent. This can be done by sending us a written or electronic request with proof of your identity or by unsubscribing from our newsletter.

As mentioned in our cookie statement, you can always revoke the consent you have given to us to set non-functional cookies by clicking the button at the top of the cookie statement.

However, the withdrawal of your consent does not affect the lawfulness of the processing operations that were already carried out on the basis of your consent before its withdrawal.

## **COMMUNICATION OF YOUR PERSONAL DATA**

### **1. The data you communicate to us yourself**

If you wish to use the contact form, we will ask you to provide personal data. You provide us with personal data at that time. By sending us an email, you share with us personal data (your email address and your name, first name, address, phone number, photo, depending on what you yourself write in your email message). This data is used to fulfil our possible contractual obligations with you and the service for you, to answer your queries and for direct marketing purposes. These data are stored on secured servers of ELUXO or those of its processor / one of its processors (the hosting company, for example), who are also strictly bound to confidentiality regarding your personal data.

### **2. Data collected based on your use of the website**

We collect data on how you use our services and website. This enables us to tailor our services even better to your needs and interests. We also use cookies to collect data on the use of the services.

### **3. Data sourced from third parties**

In principle, ELUXO does not receive your personal data through third parties. Please note that we do not collect or use information for purposes other than those described in this privacy notice.

## **TRANSFERRING YOUR PERSONAL DATA TO THIRD PARTIES**

ELUXO does not transfer personal data to third parties except if this is necessary to achieve the predefined purposes. In such cases, the customer's personal data will be shared with other companies (of the ELUXO group) within the European Economic Area that are directly or indirectly related to ELUXO or with any other partner of ELUXO.

ELUXO guarantees that these recipients will take the necessary technical and organisational measures to protect personal data.

## **HOW LONG ARE PERSONAL DATA KEPT?**

The GDPR does not impose a concrete retention period for keeping personal data. The basic principle is that personal data will not be kept any longer than is necessary. What is necessary depends on the concrete situation.

ELUXO will not retain the personal data it processes for longer than necessary to fulfil the purposes set out in this privacy notice and for which the personal data was collected.

The personal data you communicate to us as part of our contractual relationship or when you ask us a question will be kept for a period of time relevant to providing you with services or answering questions, taking into account the contractual and/or legal obligations we may have to keep this data. For example, every company, including ELUXO, is legally obliged to retain certain documents for a certain period of time (e.g. under tax laws, the Archives Act, personnel files, invoices, etc.).

## **WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?**

### **1. Right of access, rectification and data erasure**

Your personal data is and will remain your personal data. You retain full control. We therefore apply optimum transparency, propriety and lawfulness to you for its use, whereby you retain control of your personal data and what happens to it.

You have the right to request access to the personal data that ELUXO processes about you. If this

information is found to be incorrect, you have the right to have it corrected.

You also have the right in principle to have the personal data relating to you erased. Such erasure of personal data is not possible when the processing of your personal data is necessary or intended for the substantiation or defence in legal proceedings.

Your request for erasure may also be refused when required in the public interest, for the protection of the rights and freedoms of others or under the exceptions listed in law. These legal exceptions are listed in Article 17 GDPR:

- The processing is necessary for the exercise of the right to freedom of expression and information;
- The processing is necessary for compliance with a legal processing obligation laid down in Union law or Member State law and incumbent on the controller, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- The processing is necessary for public health reasons;
- The processing is necessary for scientific or historical research or statistical purposes and to the extent that the right to erasure of data risks making the achievement of the purposes of such processing impossible or seriously jeopardising it;
- The processing is necessary for the establishment, exercise or substantiation of legal claims.

## 2. Restriction of processing and objection

In certain cases, you have the right to have the processing of your personal data restricted. This could include cases in which you dispute the accuracy of the personal data or the processing is unlawful. Where appropriate, we will only store your personal data.

You also have the right to object to the processing of the personal data in question on the basis of Article 6.1(f) GDPR, including profiling on the basis of those provisions. Such an objection is not possible if the processing of your personal data is necessary for the performance of a contract.

## 3. Transferability of personal data

You have the right to obtain a copy (in a structured, common and machine-readable form) of your personal data and to have the personal data transferred to another company.

## 4. Automated decision-making

You have the right not to be subject to a decision based solely on automated processing if it produces legal effects on you or significantly affects you. This is not possible if this decision is based on your consent.

## **EXERCISE OF YOUR RIGHTS**

Exercising these rights is free of charge and can be done by sending a request by email to [info@eluxo.be](mailto:info@eluxo.be) or by post to the address of the registered office located at Duivelshoekweg 2, 2610 Antwerp, Belgium

In this request, you should provide sufficient proof of your identity as well as include the necessary information to enable ELUXO to fulfil its obligations.

If you make requests that are manifestly unfounded or excessive, ELUXO will be entitled to charge a reasonable fee or to refuse the request. In the latter case, we will notify you in writing.

## **COMPLAINTS**

If you believe that our processing of your personal data would violate the provisions of this privacy notice or the GDPR, you have the right to lodge a complaint with the Data Protection Authority at [\*this link\*](#).

## **SECURITY**

ELUXO has developed security measures adapted at a technical and organisational level to avoid the destruction, loss, falsification, modification, unauthorised access or erroneous notification to third parties of your personal data collected on our website or by any other means as well as any other unauthorised processing of your personal data.

Under no circumstances can ELUXO be held responsible for any direct or indirect, damage resulting from an erroneous or unlawful use by a third party of your personal data.

## **THE USE OF 'COOKIES'**

This website, [www.eluxo.be](http://www.eluxo.be) uses cookies. In the overview below, we would like to inform you about the use of these cookies.

Please note that some media will not be available if you do not accept the relevant cookies.

### **1. What are cookies?**

During your visit to the site, 'cookies' may be placed on your computer's hard drive. A cookie is a text file containing pieces of technical information (internet settings) that is placed by a website's server in your computer's browser or on your mobile device when you consult a website.

Cookies also include so-called 'scripts'. A script is programming code used to make our website function optimally and interactively.

The term 'cookies' also includes 'web beacons', 'pixel tags' or 'social media cookies'. These are used to integrate various social networking sites at [www.eluxo.be](http://www.eluxo.be). Embedded third-party elements, or in other words content stored with a third party, may also be displayed on our website.

As cookies are personal data, their processing is governed by our privacy notice. The processing of functional cookies is based on our legitimate interest, as the functional cookies are required for the proper functioning and security of [www.eluxo.be](http://www.eluxo.be). Other cookies will not be placed unless [www.eluxo.be](http://www.eluxo.be) has received your consent to do so.

## 2. Types of cookies

### **A. Origin**

When you visit our website, different types of cookies may be used. 'First-party cookies' are cookies placed on the website directly by [www.eluxo.be](http://www.eluxo.be). 'Third-party cookies' are cookies placed by third parties on [www.eluxo.be](http://www.eluxo.be), in particular by incorporating elements from other websites.

### **B. Duration**

'Persistent cookies' remain on your device for the lifetime of the cookie. They are activated every time you visit [www.eluxo.be](http://www.eluxo.be).

'Session cookies' simplify and link user actions during the browser session. Each time you open the browser window, these cookies are placed temporarily. Session cookies are deleted as soon as the browser is closed.

### **C. Function/purpose**

'Functional cookies' are those required to facilitate the functioning of the website and provide a personalised experience (for example, where applicable, the language setting or, in the case of the webshop, the functionality of the shopping basket).

The 'non-functional cookies' are used for statistical, social and commercial purposes and are separate from the technical support of [www.eluxo.be](http://www.eluxo.be) and do not meet the conditions to be exempted from the consent requirement. Your explicit consent is required for the placement of these cookies.

The 'analytical cookies' allow us to chart website statistics. By using Google Analytics, a web analytics service offered by Google Inc., such analytical cookies are placed on your computer to analyse how visitors use the website (which pages are most popular, what problems do visitors encounter on certain pages, etc.). The data collected in the context of Google Analytics is stored on Google Inc. servers in the United States of America. By using this website, you consent to the processing of the information by Google in the manner and for the purposes described above.

The 'performance cookies' can measure how many visitors have visited a particular web page or list popular web pages. We can also track how you arrived at our website. This information allows us to improve our website and optimise the user experience.

### **D. Permission**

The information generated by the cookies about your use of the website may be transferred to ELUXO's own secure servers or to a data processor that is also bound by strict confidentiality rules regarding your personal data. We use this information to track how you use the website, to compile reports on website activity and to offer other services related to website activity and internet usage. By using our website, you agree to our use of cookies. You can always refuse the use of cookies by selecting the relevant settings in your internet browser, but we would like to draw your attention to the fact that in that case you may not be able to fully use all the features of our website.

### **E. User management of cookies**

ELUXO uses cookies to remember the preferences of users of its website. Cookies are also used to allow the user to explore the website and to provide certain features. Another use of cookies is to ensure secure use of the website, helping to optimise visits for its users.

Web browsers offer the ability to manage cookies. That way, you can disable the use of cookies. It is also possible to delete cookies that have already been installed.

Through your internet browser, you can delete cookies automatically or manually and you can specify whether certain cookies can be placed or not. You can also set your internet browser to notify you when a cookie is set. More information on these options can be found in the instructions of your browser's Help function.

The website [www.eluxo.be](http://www.eluxo.be) uses CookieYes which allows visitors to consult the current necessary, functional, analytical, performance and advertising cookies with their type and duration at all times via the 'preferences' button in the cookie module.

CookieYes scans the entire website on which this tool is implemented every 24 hours and then makes the necessary adjustments so that the most accurate information can be made available to the visitor. ELUXO is not responsible or liable for the accuracy, completeness or usefulness of the information provided by CookieYes.

### **AMENDMENTS**

This privacy notice is tailored to the use of and features on this website. Any updates and/or changes to this website or other ways in which we collect and process data may result in changes to this privacy notice.

ELUXO may also be required to update this privacy notice in accordance with new legislation and/or recommendations of the Data Protection Authority or recommendations of the European Data Protection Authority.

### **APPLICABLE LAW AND COMPETENT COURTS**

This privacy notice is subject to the exclusive application of Belgian law. In case of any dispute regarding the validity, application, interpretation or enforcement of this privacy notice, only the courts of the company's judicial district shall have jurisdiction to hear such disputes.

If you believe that the processing of your relevant personal data breaches the General Data Protection Regulation, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which you usually reside, have your place of work or where the alleged breach has occurred.



## **QUESTIONS AND FEEDBACK**

We check compliance with applicable privacy laws and this privacy policy on a very regular basis. If you have any questions or would have liked further clarification on this privacy policy, please contact us: [info@eluxo.be](mailto:info@eluxo.be) - tel: +32 (0)3 500 05 65