

## **Privacy Statement Rupro Beheer**

### **Applicability**

This privacy statement applies to the processing of personal data by the following Rupro Group companies.

### **Rupro Group**

The following companies form part of the Rupro Group:

- Amtech Automotive B.V., Arnhem (Ch. of Comm. 52616630);
- Brekupa Technics B.V., De Meern (Ch. of Comm. 53841166);
- Explora truck & bus B.V., Gorinchem (Ch. of Comm. 23066265);
- Internationale Handelonderneming "Explora" B.V., Ede (Ch. of Comm. 09035762);
- LBS Beheer B.V., Emmen (Ch. of Comm. 04043942);
- LBS Emmen B.V., Emmen (Ch. of Comm. 04048980);
- Prema Online Benelux B.V., Arnhem (Ch. of Comm. 20126786);
- Rema Tip Top DBP B.V., Arnhem (Ch. of Comm. 66471443).
- REMA-Tip Top Nederland B.V., Arnhem (Ch. of Comm. 30054594);
- Rokafast Apeldoorn B.V., Apeldoorn (Ch. of Comm. 08209767);
- Rupro Beheer B.V., Arnhem (Ch. of Comm. 30090220);
- Tempo Trommels & Rollen B.V., Middenmeer (Ch. of Comm. 37085001);
- Transportbanden Service Nederland B.V., Arnhem (Ch. of Comm. 09069244);
- T-REX Rubber International B.V., Arnhem (Ch. of Comm. 09122091);

For reasons of clarity, we use “we”, “us” or “our” when referring in this privacy statement to one or more of these companies.

### **Our guiding principle**

The protection of your personal data is very important to all our companies. We respect your privacy and we see to it that your personal data is always treated with confidentiality and in compliance with the applicable privacy legislation.

We would like to make it absolutely clear that this privacy statement only applies to processing personal data (this means data from natural persons). As our companies are active on the corporate market, the processing of personal data means the processing of data belonging to those persons who are employed by or for our customers and our prospects.

### **Processing purposes**

We process your personal data for the following purposes:

1. To carry out the one or more contracts concluded with you or your employer or your client;

2. To keep records, to carry out analyses as well as other internal management activities;
3. To calculate, document and collect the amounts due, including having a third party collect the debts;
4. To be able to contact you and to reply to the questions you asked on behalf of your employer or client;
5. To inform you about our new products, services and offers;
6. To invite you to special events for our loyal and other customers;
7. To handle your information request application;
8. To be able to send you digital newsletters and other marketing literature;
9. To improve our communication services and other services;
10. To comply with statutory obligations, such as the requirement to keep records and the obligation to retain records;
11. To handle disputes and to cause an audit to be performed.

### **The legal basis for processing personal data**

The legal basis for processing personal data is mainly:

- To take pre-contractual steps at your request or to execute the contract concluded with you or with your employer or client;
- To comply with the statutory obligations;
- To take care of our own justified interests or those of a third party.

The legal basis for processing personal data may also be in the event of one of the following situations:

- You have given permission;
- For the protection of your vital interest or of those of other parties.

Our justified interests are to be found in us being able to conduct standard business operations, to carry out internal management activities, to carry out internal market or other analyses, to carry out marketing activities and similar activities of a commercial and business interest. It goes without saying that in all our activities we also take the privacy interest of the data subject into consideration.

You may oppose any processing of personal data based on our justified interest by invoking your right to object. You will find additional information about this right further on in this statement.

### **Mandatory provision of personal data**

When we request for your personal data, we will inform you at each occasion whether providing the personal data is necessary or mandatory and what the consequences will be, if any, if the personal data are not provided. We always proceed from the assumption that we

will not process any more personal data than what is necessary for the purposes as described above.

### **Exchange of your personal data**

Your information may be exchanged within the Rupro Group for the purposes as referred to above. This exchange of data within the Group is specifically important for marketing purposes, internal management activities, including internal analyses, as well as for collecting debts. It goes without saying that no more personal data will be exchanged than what is reasonably necessary.

Our parent company of the Rema Group is the German REMA Tip Top AG. All kinds of data are exchanged with our parent company. This mainly concerns aggregate data, so no personal data. However, it could well be possible that on occasion personal data are exchanged with our parent company. If that is the case, our parent company will process these personal data in accordance with its own privacy policy.

We do not provide any personal data to a third party who would use these data for its own ends. There are however exceptions. They are:

- When you have given your prior permission for the personal data to be provided; or
- We are mandated by law to provide personal data; or
- When the company is transferred to a successor.

### **Retention period**

Your personal data are retained in accordance with the statutory retention period. This means that we are mandated to retain personal data for at least seven years. On expiry of that seven-year period, we will only retain data that are necessary for additional processing.

### **Safeguarding your personal data**

We will take appropriate technical and organizational measures, or arrange for them to be taken, to safeguard the personal data against loss or any unauthorized processing. We have taken various measures in that regard, including encryption of data and encrypted communication. These measures are subject to a regular audit.

### **Your rights**

You have various rights under the law. We have listed them for you.

#### Right to inspect

You have the right to inspect the personal data we have processed.

#### Right to correct and to be deleted

You have the right to have your personal data to be corrected or even to be deleted, if the data is not or no longer correct or if the processing is not or no longer justified.

### Right to object

The right to object means that you may object to certain processing of your personal data on account of your specific situation. You have this right with all the kinds of processing that are not based on (1) your permission, (2) pre-contractual steps taken at your request or the execution of a contract concluded with you, (3) compliance with the statutory obligations or (4) protection of your vital interest or those of others.

When you object to your personal data being used to inform you about our activities and similar direct marketing processing activities, we will always accept your objection. We will then no longer use your personal data for direct marketing purposes.

When you object to your data being processed for other purposes than direct marketing, we will review the situation and see whether we can meet your objections. It is up to us to show you that our justified interest outweighs yours and that therefore your personal data will continue to be used, despite your objections. If it turns out that your interests outweigh ours, then we will stop processing your data.

### Right to restriction

There are circumstances under which you have the right to restriction as regards the processing of your data. The right to restriction means that we temporary “freeze” the processing of your data. You may invoke that right in four situations: (1) pending the review of your request for correction, (2) if your personal data should have been deleted but you do not want them to be deleted, (3) if we no longer need your personal data but you do need them to prepare for a legal action or to conduct a legal action and (4) pending the review of your objection.

### Right to data portability

You have the right to receive from us, or have them returned, in a standard file format the personal data you have given us. This right can only be invoked as regards your personal data we have been processing on account of your permission or a contract we had concluded with you. Moreover, this right can only be invoked for personal data we have been processing in digital form, thus not in analogue form. You are free to pass on these personal data to another party.

### Right to revoke permission

When we have asked your permission for a certain kind of processing, you have the right to revoke your permission at any time. When you do so, we will immediately stop with any further processing of your personal data. However, revoking your permission does not have a retroactive effect. This means that any processing of your personal data prior to you revoking your permission remains valid.

### To exercise your rights

You are not charged if you want to exercise any of your rights, unless you are abusing your rights. If you want to exercise any of your rights, please contact us using the contact details given below.

### Terms

We will answer your questions or requests, as a rule, within a period of one month. If it turns out, unfortunately, that answering your questions or requests requires more time, we will inform you of this delay within a month. It is possible that for reasons of the complex nature of your request or the number of your requests the deadline for a reply runs up to three months.

### Identification

We may ask you to provide additional proof of your identity when you submit your questions or requests. The reason for doing so is to prevent us from providing your personal data to the wrong party or to prevent us from making incorrect changes when processing your personal data. For a prompt and efficient handling of your request, we would like to request you to send in advance a copy of your proof of identity.

### Individual review of each request

We would like to point out that not all the rights we have described above are absolute rights. There may be circumstances compelling us not to agree to your request. However, we will always review each request on its merits. If we are unable to meet your request, we will notify this to you and we will state the reasons why we cannot meet your request. In that case, you may seek redress from the courts.

The right to object to the use of personal data for marketing purposes is an absolute right. We always accept your request to unsubscribe any form of our commercial communication.

### **Regulatory authority**

Furthermore, you always have the option to file a complaint with the regulatory authority on Dutch privacy legislation, the Dutch Data Protection Authority (Dutch DPA). You may find their contact information on their website [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

### **Questions**

Please feel free to ask us any questions you may have about the personal data we have processed. If you have any questions about our privacy policy please contact us, using the contact information listed below.

### **Changes**

This privacy statement can be changed. The changes will be published on our websites.

We may process your personal data for new purposes that are not yet listed in this privacy

statement. In that case we will contact you before we will use your data for these new purposes and to inform you of the changes in our bylaws for the protection of personal data and to offer you the opportunity to refuse participation.

**Contact information**

If you have any questions about this privacy statement or our privacy policy, or you want to invoke one of your statutory rights, please contact first the company where you are a customer.

You may also contact our compliance officer, using the following information.

Rupro Beheer,  
C/o. the Compliance Officer, Alfred van Olst  
Westervoortsedijk 73  
6827AV Arnhem  
[alfred@ruprobeheer.nl](mailto:alfred@ruprobeheer.nl)