

PRIVACY STATEMENT

LAPP BENELUX B.V.

Last updated: **02.04.2021**

We manufacture the products we offer to our customers with great care. It is important to us to treat all personal data processed in the context of our business operations with the same care. We take the protection of the privacy of visitors to our website and (potential) customers very seriously.

This privacy statement is intended to inform you about:

- how we process your personal data when you navigate our website;
- how we strive to protect your personal data;
- the rights you can exercise with regard to your personal data and the possibilities to keep control over your personal data.

In addition to this privacy statement, other documents exist within LAPP Benelux B.V. and the LAPP Group, which provide interpretation of and information about the way in which LAPP Benelux B.V. and LAPP Group safeguard the privacy of both customers and employees, for example the [LAPP Code of Conduct](#).

This privacy statement answers the following questions, among others:

- [Who collects your personal data?](#)
- [What is personal data?](#)
- [What personal data is collected?](#)
- [For what purposes is your personal data processed?](#)
- [What are cookies and which cookies are stored on your computer?](#)
- [For how long will your data be stored?](#)
- [With whom is your personal data shared?](#)
- [How is your personal data protected?](#)
- [What are your rights with respect to the processing of your personal data?](#)
- [How can you contact us for questions or complaints?](#)

This Privacy Statement may be revised and updated from time to time to comply with applicable laws and regulations, such as the General Data Protection Regulation. It is therefore advisable to regularly consult this privacy statement to stay informed of the contents of the current privacy statement. Please refer to the top of this page to find out when this privacy statement was last updated. We will notify you of any substantial changes.

Who collects your personal data?

LAPP Benelux B.V. (hereinafter "**LAPP**" or "**we**") is responsible for all personal data collected or processed while navigating our website, creating a MyLapp account, placing an order in our e-Shop, or otherwise while using our website. LAPP is located at **Van Dijklaan 16, 5581 WG, Waalre, the Netherlands**. Please see below this privacy statement for our [contact details](#).

What is personal data?

Personal data is data that directly relates to you or can be traced back to you indirectly in combination with other data. Examples include your name, telephone number, address or email address. Data such as your IP address, Lapp customer number and data about your surfing behaviour are also personal data.

What personal data is collected?

We collect the following categories of personal data, among others:

- **Contact details**, such as name, salutation, telephone number, fax number and email address. This information is collected when you create a MyLapp account, when you sign up for our newsletter or customer satisfaction survey, or when you contact us;
- **Financial data**, such as bank account number, VAT number, and credit details. This information is collected when you place an order in the e-Shop;
- **Organisational data**, such as company name, job title, the department in which you work. This data is collected when creating a MyLapp account;
- **Digitally collected data**, such as connection data like your IP address, the browser and the operating system used, the time and duration of the visit. Your IP address is only linked to order numbers when you actually place an order, because the order can then be linked to you as a customer.

For what purposes is your personal data processed?

We process your personal data for the following purposes:

- to make your visit to our website as pleasant as possible, for example by referring you to LAPP's website in English or by changing the language on the website to English when you navigate with a foreign IP address. The basis for this processing is our legitimate business interest in adapting our website to our target group as well as possible;
- to create a MyLapp account for you. The basis for this processing is the execution of an agreement, namely the user agreement between you and LAPP;
- to determine the origin of an order in our e-Shop and to ensure the processing and possible delivery of the order. The basis for this processing is the performance of a contract, namely the purchase contract that is then concluded;
- to request credit information when you request a credit account or in other justified cases, such as when a payment method is refused, or when you request payment on account. The basis for this processing is our legitimate business interest regarding your solvency;
- to keep you informed of the latest developments via our newsletter. The basis for this processing is your consent. You can revoke this permission at any time. This will result in no longer receive newsletters;
- to comply with legal obligations incumbent upon us, such as keeping financial records for tax purposes. The basis for this processing is the fulfilment of a statutory obligation;
- to facilitate our internal administration (delivery addresses with names and products sold) at corporate level. The basis for this processing is our legitimate business interest in transferring personal data within the group for internal administrative purposes, considering your interests and taking measures to protect them. Please feel free to [contact](#) us for more information on this appraisal of interests;
- to monitor how our website is used, and to prevent misuse and fraud based on general web statistics. The basis for this processing is our legitimate business interest in protecting our assets, considering your interests and taking measures to protect them.

Appraisal of interests

LAPP processes personal data for a number of purposes on the basis of legitimate interest. We take your interests into account and take appropriate measures to protect them. Please feel free to [contact](#) us for more information on this appraisal of interests.

What are cookies and which cookies are stored on your computer?

LAPP uses "cookies". Cookies are small text files that we place on your device, for example on your computer, telephone or tablet. Cookies can be used to collect or store information about the website visit or about (the device of) the user.

Session cookies

Most cookies used by LAPP are so-called "session cookies". These are deleted as soon as you leave our website. These cookies are used to make the website more user-friendly, effective and secure, for example to remember data in your shopping cart in the e-Shop.

Permanent cookies

LAPP also uses "permanent cookies" to store information about, for example, your user name and password, so that you do not have to re-enter your login details every time you visit the website. The content of the permanent cookies is limited to a number that can identify the browser you are using to navigate our website.

Targeting Cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

If you do not want cookies to be placed on your device, you can adjust this in your browser settings. You can also delete cookies manually from your hard drive (in the cookies folder). These options mean that some functionalities of the website, such as storing data in your shopping cart, will not work properly.

See below for the list of cookies we use:

Name	Placed by	Purpose	How long
Google Tag Manager	Google Ireland Ltd. (www.google.ie)	Generation of web statistics	1 year
Econda	Econda GmbH (http://www.econda.de)	Generation of web statistics	1 year

For how long will your data be stored?

LAPP sets retention periods for all personal data that are processed in accordance with applicable laws and regulations. Personal data shall under no circumstances be kept longer than necessary for the purposes for which it is used. All personal data will be destroyed when it no longer need to be stored.

LAPP uses retention periods for:

- **financial data**, such as bank account numbers and invoices stating your personal data. This information is stored for up to 7 years after the issuance of invoices or for as long as necessary to comply with the statutory retention obligation;
- **contact details**, these details are kept for 7 years after acquisition if they are related to the financial administration. Data obtained by other means will be deleted 2 years after acquisition;
- **data processed on the basis of the legitimate interests of LAPP**, such as activity and log files of the website. This data will be kept for a maximum of 24 days and deleted as soon as it is no longer necessary for the protection of these interests.

With whom is your personal data shared?

LAPP employees

Your personal data will only be processed by LAPP employees for the purposes listed above under the section 'For what purposes is your personal data processed?'. They shall be subject to a duty of confidentiality and shall be granted access to personal data insofar as their position so requires. For example, employees of the Finance and Sales department have access to your financial information, because they need this information to effectuate orders in the e-Shop and possible delivery.

Service providers

We may share your personal data with third parties whom we carefully select and use to provide certain services to LAPP. These parties—also referred to as processors—process personal data for the benefit of LAPP, for example for:

- the delivery of products ordered in the e-Shop;
- requesting your credit information.

LAPP makes agreements with all its processors about the processing of your personal data. For example, they are contractually obliged to process your personal data only on our instructions and to protect your data appropriately and keep it confidential. Moreover, they are legally obliged to adequately process your personal data. Only the personal data strictly necessary for the provision of their services is shared with third parties.

Legal obligation

In some cases, LAPP is legally obliged to share your personal data with competent (public) authorities, for example national enforcement authorities. LAPP tests the legitimacy of requests from competent supervisors in all cases. We may also share your personal data with authorities where necessary for the protection of our rights and property.

International data transfer

Your personal data may be shared with organisations or other parties located outside the countries of the European Economic Area. If this is the case, and if the country of the recipient of your personal data does not provide adequate protection, we will take appropriate measures for the transfer of data, such as the conclusion of EU Model Contracts. For more information about the measures taken, please feel free to [contact](#) us.

How is your personal data protected?

LAPP protects data against loss and any form of unlawful use or processing. To this end, LAPP uses appropriate technical and organisational measures, taking into account the state of the art. For example, LAPP uses pseudonymisation, strict physical and technical access controls, and SSL certificates via the HTTPS protocol. In addition, LAPP's security measures are regularly tested by external experts.

What are your rights with respect to the processing of your personal data?

You have the right to examine what personal data has been collected about you and for what purpose, and to have this data adjusted if desired. In certain cases, you also have the right to have the collected personal data deleted, screened off or to restrict or object to the processing. Furthermore, in certain cases, you have the right to have your personal data transferred in a common and machine-readable form, and you can at any time submit a complaint to LAPP or to the [Personal Data Authority](#) regarding the processing of your personal data by LAPP.

You can exercise the rights described above by contacting us via our [contact details](#). You will receive an answer from us as soon as possible, but within four weeks at the latest. In order to identify you, we may ask you for proof of identity, such as a copy of your identity document on which only your name is visible and the rest is made illegible.

Chat function

You're getting in touch with us via chat on the website is enabled by Userlike. The software uses cookies, i.e. text files that are stored on your computer, facilitating a personal conversation with you in the shape of a real time chat on the website.

We should like to point out in this context that any data you send to us freely via chat is stored to process your request and for the purpose of statistics. Only the chat record is stored. Any data in the record of the chat are neither used to identify any website visitors nor for other purposes or advertising. The data is saved for one year. The chat record is deleted after one year.

Login, LAPP ID

LAPP's authentication system (LAPP-ID) is used for unique personal identification and supports all customers in a secure login.

The LAPP-ID consists of: Personal email address + password.

When you register for the LAPP-ID customer ID, we record the data you provide. In addition, we assign requests and user behaviour, this concerns in particular when and how often you log into the e-Shop, or whether you register for webinars, have questions via the chat, or configure cables via the configurator.

In addition to managing customer identity and profile data, the uniform login also serves to protect customer information from attacks. Furthermore, we personalise the website for you on this basis in order to be able to offer them relevant information and suitable products or services.

The legal basis for the use of the registration data is Art. 6 para. 1 lit. b GDPR, insofar as it concerns the initiation, conclusion and execution of a contract (Art. 6 para. 1 lit. f GDPR, insofar as you are an employee of our customer; the legitimate interest is the conclusion of a contract). For the better customisation of the site, the legal basis is Art. 6 para. 1 lit. f GDPR; the legitimate interest is the optimisation and personalisation of the shop and other offers.

LAPP uses the software module Auth0 from the manufacturer Auth0 Inc. 10800 NE 8th Street Suite 600 Bellevue, Washington 98004 for login. For this purpose, the user's e-mail address and password are transmitted to Auth0. By registering for a LAPP ID, the user expressly consents to the transmission of his/her personal data to this external identity provider, whose servers are located in the USA or an EU state. Further information can be found at <https://auth0.com/docs/compliance>.

The appropriate level of data protection is ensured by EU standard contractual clauses. Auth0 has taken the "Schrems 2 decision" of the ECJ as an opportunity to work on further safeguards. We are monitoring this closely and calling for solutions.

How can you contact us for questions or complaints?

In writing

**Van Dijklaan 16
5581 WG Waalre (NL)**

By email or telephone

Ton Geomini (Finance & HR Director)

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