

PRIVACY STATEMENT

LAPP BENELUX BV

Last updated on: **17.10.2022**

This is a translation from Dutch. In case of any doubt or ambiguity, the Dutch version shall prevail.

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. The rules of the General Data Protection Regulation (GDPR; AVG in the Netherlands) and the European e-Privacy Directive guide the interpretation of this privacy statement.

This privacy statement is intended to inform you about:

- how we process your personal data when you navigate our website;
- how we process your personal data for marketing purposes using the SAP Marketing Cloud;
- 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 BV 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 is responsible for the collection of 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?](#)
- [Which systems do we use when we process 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 and the European e-privacy guideline. 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 is responsible for the collection of 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, phone 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, (business) telephone number, fax number and (business) 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/fiscal 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, address and location and/or delivery address, job title, the department in which you work. This data is collected when creating a MyLAPP account, among other things;
- **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 present personalised changes on the website. The basis for this processing is our legitimate business interest in displaying relevant content for our website visitors and to optimise and personalise the offer in our e-Shop and other offers;
- to create a MyLAPP account/LAPP ID for you. The basis for this processing is the initiation, conclusion and execution of an agreement, including 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 in understanding your ability to pay and, on that basis, assessing whether the selected payment method is appropriate;

- to keep you informed of the latest developments via our newsletter. The basis for this processing is your consent or – depending on the nature of your (existing) relationship with us and the content of the newsletter – the legitimate business interests of LAPP. You can revoke this permission at any time or object to (opt-out of) receiving newsletters. This means you will no longer receive our newsletters. More information about LAPP's legal grounds for sending newsletters can be found under the heading 'SAP Marketing Cloud: Newsletters, price updates and product information' elsewhere in this privacy statement;
- to track the actions in the newsletter, such as measuring click-through rates using the SAP Marketing Cloud. The basis for this processing is your consent;
- 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 (including delivery addresses with names and products sold) at the corporate level. The basis for this processing is our legitimate business interest in transferring personal data within the group for internal administrative and business operational purposes, taking into account your (privacy) interests and taking measures to protect them;
- 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, taking into account your interests and taking measures to protect them;
- to store data that is collected within the real-time chat feature on the LAPP website. The basis for this processing is our legitimate business interest for statistical purposes.

If we need your personal data to comply with a legal obligation or to initiate, conclude and execute an agreement, you are in principle obliged to provide us with this data. If you cannot or are not allowed to provide this to us, this may lead to us not being able to process your request or order.

Appraisal of interests

LAPP processes personal data for a number of purposes on the basis of legitimate interest. We take your (privacy) 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 or to chat to our staff in real time.

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 placed by our advertising partners through our site. They may be used by these companies to create a profile of your interests and show you relevant ads on other sites. They do not store direct personal information, but are based on a unique identification of your browser and internet device. If you do not allow these cookies, you will see 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.

Please see below for the list of targeting cookies we use:

Name	Placed by	Purpose	How long
Econda	Econda GmbH (http://www.econda.de)	Generation of web statistics	1 year

Tracking Cookies (newsletter only)

In addition to cookies during visits to the LAPP website, LAPP also uses tracking cookies within the newsletter that (many of) our customers receive.

This type of personal data that is collected via the tracking pixels (tracking cookies) included in the newsletters is stored and analysed by the controller in order to optimise the sending of the newsletter and to tailor the content of future newsletters to your interests even more. More information about the analysis of the personal data collected by the tracking cookies can be found under the heading 'SAP Marketing Cloud: Newsletters, price updates and product information'.

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 the following categories of personal data, among other things:

- **financial/fiscal data**, such as bank account number and invoices with your personal data on them are kept for up to 7 years after the issuance of invoices or for as long as necessary to comply with the statutory retention obligation;
- **contact data** is kept for up to 7 years after acquisition if it is 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 is kept for a maximum of 24 months 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?](#)'. Our employees are 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 are often referred to as processors and they process personal data for the benefit of LAPP, for example for:

- the delivery of products ordered in the e-Shop;
- supporting our e-marketing activities;
- (web) hosting of our websites and IT systems;
- sending and monitoring marketing communications (newsletters, price updates and product information) via the SAP Marketing Cloud;
- 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 and/or the tax 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 if it is incorrect. 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 getting in touch with us via our [contact details](#). You will receive an answer from us as soon as possible, but within one month at the latest. In the case of highly complex requests, we may extend this period by a further two months. In order to identify you, we may ask you for information based on which we can determine your identity. Where possible, this will be done via contact details or the existing login system, such as LAPP ID. LAPP may ask you, for example, to log in to the website, send a confirmation of your request by email, or confirm an SMS code. If LAPP is unable to verify your identity properly, a copy of your ID may be requested, showing only your name with the rest of it made illegible. In this case, LAPP will ask you to make all data illegible on the photo or scan, barring your name and the validity date of the document.

Which systems do we use when we process your personal data?

Chat functionality

You can get in touch with us via the chat functionality on the website by enabling Userlike. This software uses cookies, i.e. text files that are stored on your computer and that facilitate a personal conversation with you in the form of a real-time chat on the website.

In this context, we want to point out that all data that you send us via chat is stored in order to process your request and for statistical purposes. Only the chat record is stored. The data in the chat file is not used to identify visitors to the website, nor for other (marketing) purposes or advertising. The data shall be kept for one year. The chat record shall be deleted after one year.

Login, LAPP ID

LAPP's authentication system (LAPP-ID) is used to facilitate unique personal identification and supports all customers with logging in securely. The LAPP ID consists of: Personal email address + password.

When you register for the LAPP ID customer ID, we record the data you provide. We also record requests and user behaviour. This relates specifically to when and how often you log into the e-Shop, or if you register for webinars, ask questions via the chat, or configure cables via the configurator.

In addition to managing the identity and profile data of our customers, the uniform login also serves to protect customers' information against attacks. On this basis, we also personalise the website for you, in order to be able to offer you relevant information and suitable products or services.

LAPP uses the Auth0 software module from the manufacturer Auth0 Inc. 10800 NE 8th Street Suite 600 Bellevue, Washington 98004, USA, for login. To this end, the user's email address and password are passed on to Auth0. By registering for a LAPP ID, the user expressly agrees to the transfer of their personal data to this external identity provider, whose servers are located in the USA or an EU Member State. Further information can be found at <https://auth0.com/docs/compliance>.

The appropriate level of data protection is ensured by the EU's standard contractual clauses. Auth0 has seized upon the "Schrems 2 decision" of the Court of Justice to work on further safeguards. We constantly monitor the continuous improvements that Auth0 makes in this context.

LeadInfo for measuring business website usage

In order to measure the business use of our website, we use the services of Leadinfo from Capelle aan den IJssel in the Netherlands. This service shows us company names and addresses based on our visitors' IP addresses. The IP address is not included.

SAP Marketing Cloud: Newsletters, price updates and product information

All active customers in the Benelux (last purchase up to 3 years ago) receive our newsletter and price updates. You have the right to opt-out of all communications we offer at any time you wish, and to change your preferences. Please use the 'unsubscribe' button that is added to every marketing-related email to do so.

If you are not (yet) an 'active customer', you can also subscribe to our marketing-related emails or newsletters. For legal reasons, we will then send a confirmation email to the email address that you initially registered as part of the double opt-in process. We use this confirmation email to check whether the rightful owner or user of the email address as a data subject has consented to the sending of the newsletter or the future sending of emails for marketing purposes. During registration, we also store the IP address of the computer system assigned by the Internet Service Provider (ISP) and used by you at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to reconstruct at a later time any (possible) misuse of the email address you have provided.

We use SAP Marketing Cloud to send and analyse emails in the form of newsletters, price updates and product information. The data you enter in order to receive the newsletter is processed on the servers of SAP Marketing Cloud, located in Eemshaven (the Netherlands). When we send newsletters using SAP Marketing Cloud, we are able to determine whether a newsletter message has been opened and which links, if any, have been clicked on. SAP Marketing Cloud also enables us to classify the recipients of newsletters into different categories (also known as tagging). This facilitates subdividing the newsletter recipients according to their interest in a particular product or product group. We use 'Web beacon' to measure e-mail opening rates. The click-through rate is measured using SAP Marketing Cloud URLs that are assigned to the email. Interests are automatically assigned based on the clicks on a URL or image. The allocation of these interests has no impact whatsoever on the possibility to purchase services from LAPP or on the assessment of whether or not and under what conditions you can enter into an agreement with us.

How can you contact us for questions or complaints?

In writing

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

By email or telephone

Roel Janssen (Privacy Officer)
roel.janssen@lapp.com
+31 (0)40-2285027

Ton Geomini (Finance & HR Director)
ton.geomini@lapp.com
+ 31 (0)40-2285030