

# Stylepoint Privacy Policy

Stylepoint B.V. (hereinafter: "Stylepoint") is the specialized importer of covered table items such as porcelain, glassware and cutlery. Stylepoint supplies to, among others, catering companies with an accurately selected distribution network.

Stylepoint processes personal data within the framework of its services. Stylepoint cares a lot about your privacy and therefore carefully handles the personal data it processes, according to the legal requirements that are set for it. In this privacy policy, Stylepoint informs data subjects for what purposes Stylepoint processes personal data, how this is done and which rights the data subjects have.

The effective date of this privacy regulation is 17 May 2018. The publication of a new version will void the validity of all previous versions. If you have questions about Stylepoint's privacy policy, please contact our contact person for privacy related matters, you will find the contact details in article 13 at the end of this privacy policy.

## Article 1 Definitions

Stylepoint: Stylepoint B.V. ;

Personal data: any information concerning an identified or identifiable natural person;

Processing of personal data: every action, or whole of actions, relating to personal data;

Responsible: the person who has formal legal authority to determine the purpose and means of processing personal data by Stylepoint;

Person concerned: the person to whom a personal data, processed by Stylepoint, relates;

Processor: the person who processes personal data for the responsible party, in accordance with his instructions and under his explicit responsibility, without being his subordinate;

Employee: a person employed, or under direct authority, of Stylepoint;

Third party: everyone, not being: the person responsible, a staff member of Stylepoint, or any other person who processes data under direct authority of the responsible personal data, or a processor.

## Article 2 Scope

These regulations apply to all processing of personal data by Stylepoint that fall under the scope of the Personal Data Protection Act.

## Article 3 Purposes of the processing of personal data

### **General purpose of the processing**

Stylepoint uses your data exclusively for the benefit of its services. This means that the purpose of the processing is always directly related to the assignment you provide. Stylepoint does not use your data for (targeted) marketing. If you share data with Stylepoint and it uses this data to contact you at a later date, other than at your request, Stylepoint will ask you for permission. Your information will not be shared with third parties, other than to comply with accounting and other administrative obligations. These third parties have all been kept confidential on the basis of the agreement between them and Stylepoint or an oath or legal obligation.

### **Automatically collected data**

Data collected automatically by Stylepoint's website (s) are processed with the aim of further improving her services. This information (eg your IP address, web browser and operating system) is not personal data.

### **Participation in tax and criminal investigation**

In such cases, Stylepoint can be held on the basis of a legal obligation to share your data in connection with government tax or criminal investigations. In such a case, Stylepoint is forced to share your data, but it will oppose it within the possibilities offered by the law.

## Article 4 Processing agreements with third parties

Below you can read how third parties process your data, where they are stored, which security techniques are used and for whom your data is transparent.

## Webshop software

### **Magento**

The Stylepoint web store was developed with software from Magento. Personal data that you make available to us for the benefit of our services will be shared with this party. Magento has access to your data to provide Stylepoint (technical) support, they will never use your data for any other purpose. Magento is obliged to take appropriate security measures based on a closed agreement with Stylepoint. These security measures consist of the application of SSL encryption, a strong password policy and secure data storage. Magento reserves the right to share collected data within its own group and affiliated partners to improve the service. Magento takes into account the applicable statutory retention periods for (personal) data.

### **Webhosting Cream**

Stylepoint purchases web hosting and e-mail services from Cream. Cream processes (personal) data on behalf of Stylepoint and does not use your data for its own purposes. However, this party can collect metadata about the use of the services. These are not personal data. Cream has taken appropriate technical and organizational measures to prevent loss and unauthorized use of your (personal) data. Cream is obliged to observe secrecy on the basis of the closed agreement with Stylepoint.

## Email and mailing lists

### **MailChimp**

Stylepoint sends e-mail newsletters with MailChimp. MailChimp will never use your name and e-mail address for other purposes. At the bottom of every e-mail, sent automatically via our website, you will see an 'unsubscribe' link. You will no longer receive the newsletter by clicking on the unsubscribe link. Your (personal) data is stored securely by MailChimp. MailChimp uses cookies and other internet technologies that make it clear whether e-mails are opened and read. MailChimp reserves the right to use your data to further improve the service to share information with third parties.

### **Internet provider (Ziggo, Telfort and Online)**

Stylepoint uses the services of an internet provider (Ziggo, Telfort and Online) for its regular business e-mail traffic. These parties have taken appropriate technical and organizational measures to prevent abuse, loss and corruption of your data as much as possible. The internet provider does not have access to Stylepoint's mailboxes and treats our e-mail traffic confidentially. For the regular business e-mail traffic Stylepoint uses the services of its own server. This party has taken appropriate technical and organizational measures to prevent abuse, loss and corruption of your data as much as possible. Stylepoint's own server does not have access to Stylepoint's mailboxes.

## Shipping and logistics

### **DHL**

When you place an order, Stylepoint is responsible for having your package delivered to you. Stylepoint uses the services of DHL to carry out the deliveries. It is therefore necessary that we share your name, veins and residence details with DHL. DHL only uses this information for the purpose of executing the agreement. In the event that DHL engages subcontractors, DHL will also make your details available to these parties.

## Invoicing and accounting

### **GAC Microsoft Dynamics**

To maintain the administration and accounting of Stylepoint, we use the services of GAC Microsoft Dynamics. Stylepoint will share your name and address details and details regarding your order. This data is used for managing sales invoices. Your (personal) data is sent and stored protected. GAC Microsoft Dynamics is obliged to maintain confidentiality and will treat your data confidentially. GAC Microsoft Dynamics does not use your (personal) data for purposes other than those described above.

## Article 5 Personal data

Stylepoint will, insofar as necessary in the context of the purposes referred to in Articles 3 and 4, process information about the (company) name, address and address of the person concerned (name and address details) as well as e-mail addresses, telephone numbers and job titles.

## Article 6 Dealing with personal data

1. Stylepoint ensures that personal data is processed carefully and properly.
2. Every employee is obliged to comply with the privacy regulations and confidentiality of the personal data.
3. Every employee only has access to personal data insofar as this is necessary for the performance of his / her work.

## Article 7 Obtaining personal data

1. Stylepoint will receive personal data from the person concerned and in the context of collaborations with third parties who have obtained permission from the person concerned for the transfer of personal data to Stylepoint.
2. If the personal data has not been obtained from the person concerned, Stylepoint shall note in its files from whom the personal data has been obtained.
3. Google Analytics and Cookies: Stylepoint uses Google Analytics and Cookies to keep track of how users use the website.

Via Stylepoint's website (s) cookies are placed from the American company Google, as part of the "Analytics" service. Stylepoint uses this service to keep track and to receive reports on how visitors use the website. This processor may be obliged to provide access to these data on the basis of applicable laws and regulations. Stylepoint collects information about your surfing behaviour and shares this information with Google. Google can interpret this information in conjunction with other datasets and thus track your movements on the internet. Google uses this information to provide, among other things, targeted advertisements (Adwords) and other Google services and products.

### **Cookies from third parties**

In the case that software solutions from third parties use cookies, this will be stated in this privacy statement.

## Article 8 Providing personal data

1. Personal data that have not been anonymized will only be provided to third parties with the unambiguous consent of the data subject, unless the provision to third parties is necessary for the performance of the agreement with the party concerned, to comply with a legal obligation to which the controller is subject or if it providing is necessary for the protection of vital interests of the person concerned or necessary for the defense of the legitimate interest of the controller or the third party.
2. Stylepoint can, with due observance of the provisions of the Personal Data Protection Act, outsource the processing of personal data to a processor.

## Article 9 Retention periods

Subject to legal requirements regarding retention periods, personal data, in a form that makes it possible to identify the data subject, are no longer retained by Stylepoint than is necessary for the realization of the purposes for which they were collected and processed. The analytical data provided by Google Analytics will be stored for 38 months by Stylepoint. Stylepoint stores customer data as long as you are a client of Stylepoint. This means that Stylepoint stores your customer profile until you indicate that you no longer wish to use its services. If you indicate this, Stylepoint will also consider this as a forgetting request. Based on applicable administrative obligations, Stylepoint has to keep invoices with your (personal) data. Stylepoint will therefore keep this data for as long as the applicable term runs. However, employees no longer have access to your client profile and documents that Stylepoint has produced in connection with your assignment.

## Article 10 Right to improvement, addition, protection and removal

On the basis of the applicable Dutch and European legislation, you as a data subject have certain rights with regard to the personal data that is processed by or on behalf of us.

In principle, Stylepoint sends copies and copies of your data to your already known e-mail address to prevent misuse. In the event that you wish to receive the data at another e-mail address or for example by post, Stylepoint will ask you to identify yourself. Stylepoint keeps records of completed requests; in the case of a forgery request, Stylepoint administers anonymised data. You receive all copies and copies of data in the machine-readable data format that Stylepoint uses within its systems. You have the right to file a complaint with the Dutch Data Protection Authority at any time if you suspect that Stylepoint is using your personal data in the wrong way.

### **Right of inspection**

You always have the right to inspect the data that Stylepoint processes or processes and that relate to your person or that can be traced back to it. You can submit a request to that effect to Stylepoint her contact person for privacy matters. You will receive a response to your request within 30 days. If your request is accepted, Stylepoint sends you a copy of all data with an overview of the processors who have this data to them, including the category under which Stylepoint stored this data.

### **Rectification right**

You always have the right to have the data processed or processed by Stylepoint that relate to your person or that can be traced back to it, rectified. You can submit a request to that effect to Stylepoint's contact person for privacy matters. You will receive a response to your request within 30 days. If your request is granted, Stylepoint will send you a confirmation that the details have been changed at the e-mail address known to us.

### **Right to restriction of processing**

You always have the right to limit the data that Stylepoint processes or has processed that relate to your person or that can be traced back to it. You can submit a request to that effect to our privacy contact person. You will receive a response to your request within 30 days. If your request is accepted, Stylepoint will send you a confirmation that the data is no longer processed until you remove the restriction.

### **Right of transferability**

You always have the right to have the data that Stylepoint works or has processed and that relate to your person or that can be traced back to you, transferred to another party. You can submit a request to that effect to our privacy contact person. You will receive a response to your request within 30 days. If your request is granted, Stylepoint will send you copies or copies of all information about you that we have processed or processed on our behalf by other processors or third parties on the e-mail address known to us. In all likelihood, Stylepoint will no longer be able to continue the service in such a case, because the secure linking of data files can then no longer be guaranteed.

### **Right of objection and other rights**

In certain cases you have the right to object to the processing of your personal data by or on behalf of Stylepoint. If you object, Stylepoint will immediately stop the data processing pending the settlement of your objection. If your objection is well-founded, Stylepoint will make copies and / or copies of data that we process or have made available to you and then permanently discontinue the processing. You also have the right not to be subject to automated individual decision making or profiling. Stylepoint does not process your data in such a way that this right applies. If you think that this is not the case, please contact Stylepoint's contact person for privacy matters.

## Article 11 Legal protection

1. Against a rejection of a request on the grounds of Article 10, the person concerned can turn to the court with the written request to order Stylepoint to still grant the request or to honor the objection.
2. The petition must be submitted within six weeks of receiving the Stylepoint reply. If Stylepoint does not respond within the set period of four weeks, the petition must be submitted within six weeks after the end of that term.
3. The person concerned may also contact the Data Protection Board within the period referred to in paragraph 2 with the request to mediate or advise in his dispute with Stylepoint.

## Article 13 Entry into force and amendment of the Privacy Regulations

1. These regulations come into force on 17 May 2018. These regulations can be cited as "StylePoint Privacy Regulations".
2. For more information about the processing of personal data by Stylepoint, can contact L. Arends via telephone number +31 (0) 30 687 84 84 or e-mail [info@stylepoint.nl](mailto:info@stylepoint.nl).
3. Stylepoint reserves the right to change the privacy regulations at any time. On this page you will always find the most recent version. If the new privacy policy has consequences for the way Stylepoint processes already collected data relating to you, Stylepoint will inform you by e-mail.