

OutTrade BV

General Data Protection Regulation 2018



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Privacy Statement OutTrade BV

Introduction

In this General Data Protection Regulation you, as a customer, gain insight into the data we process and the way in which we do this. Moreover, you find the rights you have after the introduction of the General Data Protection Regulation on 25 May 2018. For questions: please contact us at privacy@outtrade.eu and we will provide you with an answer as soon as possible.

1.1 OutTrade BV: who are we?

OutTrade BV, inspiring and innovative. OutTrade has been specialised in products for the garden, the patio and outdoor living since 2004. Especially in the field of Food & Fire! Hip, trendy and original, without losing sight of quality. That is what OutTrade is all about. With SunRed heaters, RedFire fire bowls and patio fireplaces, we have been heating and enhancing both modern and classical gardens and (catering) terraces for years now. Our brand BBGrill increases the joy of outdoor living and consists of fun and distinctive barbecue products, whilst looking at product development and new trends every season. With the lifestyle brand KEK, the latest addition to our collection, we take the creation of an ambience to the next level. The brand is characterised by its quirky and striking designs of garden and interior accessories according to the latest trends.

By spotting trends, OutTrade keeps innovating the product development. Think of the inspiring retro line of SunRed patio heaters, the modern designed fire bowls with laser cut designs or the trendy stools of KEK. And all this under Dutch Design, because from our headquarter in the Netherlands our design team works on the development of new and distinctive products on a daily basis.

2.1 Personal data information obligation

Privacy, with digitization this is becoming a growing issue. It is not for nothing that we as OutTrade BV also adapt to the new legislation of May 25, 2018, in which the General Data Protection Regulation (AVG) is in force. This also includes the obligation to provide information, in which you as a customer are informed about which data we process and what happens with this data.

Purposes and legal bases for processing

At OutTrade BV we only process personal data that is necessary for carrying out an order or agreement. It is possible that the data is accessed by third parties, this concerns billing companies or administration companies. We never request any special personal data, so this will never end up at third parties. We make every effort to ensure your privacy and therefore work with electronically secured portals to keep the data confidential and safe.

To keep things simple and clear for you, we will show per group which of your information we store and on what basis we do this.

Services, customer database and financial processing

- **Purpose:** Manage orders / completing the agreement

- **Data:** Name and address details, delivery address, billing address, e-mail address, telephone number, payment details, Chamber of Commerce number, VAT number and customer number.
- **Basis:** Implementation of the agreement
- **Retention period:** As long as necessary for this purpose

Marketing newsletters

- **Purpose:** To inform and interest customers
- **Data:** Since all our contacts are already in our target group, it is not of importance to us to know more than the first and last name and the (company) e-mail address. In this way we process as little data as possible and is the privacy better guaranteed.
- **Basis:** Given permission
- **Retention period:** As long as necessary for this purpose, unless the person concerned states he or she no longer wishes to receive the newsletter. In the newsletter you always have the option to unsubscribe. After this notification, the contact will be completely deleted from the database.

2.2 Duration of storage

The data is stored in our database until further notice from the person concerned. Or when the legal storage period has expired. Then the personal data will be removed at OutTrade.

2.3 Right of inspection

As a customer you always have the right to access your own data. Moreover, it is always possible to submit a request for rectification or deletion of the data. This will then be picked up a.s.a.p. by the responsible department. This request can be submitted to privacy@outtrade.eu. We strive to inform you about the continuation of your application within 48 hours. In addition, according to European law, you always have the right to lodge a complaint or object to the processing of your data to the Authority.

You can also request OutTrade to limit the processing of personal data. You have that right under certain conditions. If you appeal to the data transfer of your personal data, then we as OutTrade BV must comply with it. We will then provide this information in a conventional and well-organized way, which can be opened in a simple manner in another common digital system.

2.4 Processors of personal data

OutTrade BV uses external parties to make the agreement run as optimal as possible. Think of the financial administration or the processing of customer data in the digital order processing system, in order to execute the agreement. By signing the processing agreements, OutTrade guarantees to treat your (company) data confidentially.

2.5 Cookies, what and how?

A cookie is a small text file that is placed on a tablet, smartphone or PC. Cookies are necessary to let a website run optimally and thus provide you with a better user experience. It can also help us to improve the website and tailor it to the wishes of the visitors.

Which cookies?

We use the cookies we save for functional purposes. As previously mentioned, the cookies are used to see how we can improve the website even more. Because of the cookies we can easily map this. In doing so, we treat the data confidentially and it cannot be traced back to a specific person.

2.6 may this statement be changed?

This Privacy Statement can be changed. That is why we advise you, if you want to remain informed, to check this statement several times.

Do you still have questions after reading this Privacy Statement about how we process data at OutTrade BV? Send us an e-mail to privacy@outtrade.eu. If you have a complaint, it can also be sent to the same e-mail address. You can also always contact the national privacy protection authority. In the Netherlands, this is the Authority for Personal Data.

3.1 Data protection officer

At the moment, a data protection officer has been appointed within OutTrade, with whom you can get in touch via privacy@outtrade.eu. Given the nature of the data that is processed and that there are no special personal data involved, no DPIA is required for the time being.

4.1 Privacy by default

OutTrade only processes data necessary for a specific purpose. Think of our software solutions for the entire organization, in which we process the data clearly and securely in order to execute the agreement. This is how we operate with a legitimate basis, given the GDPR.

This external party supports OutTrade with additional software service and will, in case of a problem, always do everything to fix the problem as quickly as possible. In addition, OutTrade also relies on external parties that support the financial administration. Clear agreements have been made, so we know for sure that no data is stored that is not necessary for successful processing.

5.1 Data mapped with our own processing register

In order to have a clear overview of the (processed) data of our customers, we will also manage a processing register from 25 May 2018. This contains any changes or new registrations with regard to our customers. This way we want to make clear which information we process, how often we do this and the way in which we do this.

Since this register is maintained by us, you as a customer can also gain insight into the data that we process after 25 May. As stipulated in the new law, you can always submit a request to access your data processing. Again, you can contact privacy@outtrade.eu.

6.1 Information security policy

This Privacy Statement is of course all about the confidentiality of your data. Your data is sometimes processed by external parties or is only processed in our own database. In order to draw up a clear policy, it is important to first look at the various aspects that will be discussed:

Online for own use

The website uses cookies (see 2.5) to optimize the browsing experience. This data remains anonymously at all times and cannot be traced back to you as a person. You will also be given the opportunity to register for the newsletter on the (new) website. We only require your first and last name and your e-mail address. From a privacy perspective, we have the policy of not processing more than necessary, with this concrete example we would like to support this.

The data will only be sent to software programs that enable us to analyse the surfing behaviour and to send newsletters automatically.

External parties

Other external parties, where more data is processed than just a first and last name, are screened for

security service. In addition, OutTrade only works with parties that provide a clear insight into how they handle the data and ensure that they only use the data to provide us with the best possible service.

In addition, these parties must work with reliable software security, so we do not have to doubt whether this data is protected in the best possible way. In the unlikely event that a problem arises (or a suspicion thereof), the processor agreement indicates that we as data controller must be informed within 24 hours.

Processing register

In order to shape the policy and to be able to monitor it, OutTrade will maintain a processing register from May 25, 2018. This way we gain more insight into the data and we can also inform and anticipate earlier, in case something happens to your data.

Dataleak

Should these leaks occur unexpectedly, OutTrade informs the Dutch Data Protection Authority as quickly as possible and within a maximum of 24 hours.

*** This policy is being worked on and therefore this policy can still be adapted and extended.**

7.1 Is your data provided to third parties?

As stated earlier in this Privacy Statement, it may happen that your data is in the hands of third parties. These are external parties with which OutTrade has concluded contracts in order to serve the customer as optimally as possible. Think of the customer database, payment processing, creating the website and the staff administration. In order to ensure that they also handle your data confidentially and with integrity, we have drawn up a processor agreement, which can also be found in the appendix of this statement.

If you still have questions despite this Privacy Statement, you can always send them to privacy@outtrade.eu.