

## GENERAL WEBSITE PRIVACY POLICY

SIG Air Handling The Netherlands B.V. and its subsidiaries (“We”) are committed to protecting and respecting your privacy. This policy (together with our Terms Of Use and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act and the General Data Protection Regulations (GDPR) referred to in this policy as (“the Act”), the data controller is SIG Air Handling The Netherlands B.V., Tielstraat 19, 5145 RC Waalwijk, The Netherlands or any of the SIG Air Handling The Netherlands B.V. subsidiaries.

Our nominated representative for the purpose of the Act is:

The IT Manager  
Tielstraat 19  
5145 RC Waalwijk  
The Netherlands  
Email: [itsupport@sigairhandling.nl](mailto:itsupport@sigairhandling.nl)

### Changes to our privacy policy

Any changes we may make to our privacy policy will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy. This policy was last updated March 2018.

### Purpose and legal basis for processing

We will process your data for the purposes detailed in this policy under legitimate business interests, where the processing is not overridden by your data protection interest or fundamental rights and freedoms. The nature of our legitimate interests are direct marketing, web analytics and fraud detection and prevention.

### Information we may collect from you

We may collect and process the following data about you:

### Information you provide

You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Site, search for a product, place an order on our Site, enter a competition, promotion or survey and when you report a problem with our Site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information.

### Information we collect about you

With regard to each of your visits to our Site we may automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- SIG Air Handling The Netherlands B.V. or any of its subsidiaries may use third party providers, to deliver email marketing. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-marketing. We will make sure all third party providers have privacy policies readily available and accessible through their digital platforms.

### Information we receive from other sources

We may receive information about you e.g. name, email address, telephone number if you use any of the other websites we may operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and we may receive information about you from them.

### Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy which can be found in our corporate website.

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### Uses made of the information

We use information held about you in the following ways:

### Information you provide

We will use this information:

To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;

- To notify you about changes to our service;
- To ensure that content from our Site is presented in the most effective manner for you and for your computer.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this by checking boxes on the forms we use to collect your data. You can subsequently withdraw consent at any time by contacting the relevant marketing department (although this will not affect any uses of your personal information prior to withdrawal).

### Information we collect about you

We will use this information:

- To administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our Site to ensure that content is presented in the most effective manner for you and for your computer;
- As part of our efforts to keep our Site safe and secure.

### Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### Disclosure of your information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of The Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- Our Web Hosting service providers;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If SIG Air Handling The Netherlands B.V. or any of its subsidiaries or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. As we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to carry out our obligations and enforce our terms and conditions applicable to the Services and other agreements, including for billing and collection purposes; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, our customers, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. This includes exchanging information with other companies and organizations where reasonably necessary for the purposes of fraud protection and credit risk reduction.

### Where we store your personal data

All information you provide to us is stored on our secure offsite servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The password is stored and encrypted in an SQL database and it cannot be decoded and read by anyone.

The information that we collect from you may be transferred to, and stored in, a country outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. The laws in some countries may not provide as much legal protection for your information as in the EEA. By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

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### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.

### Transmission Security

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site over unsecure internet connections; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We may use appropriate technical and organisational measures to protect the personal data collected about you.

### Retention Period

We are only permitted to retain your information for as long as necessary for the purposes set out in this policy. The restriction is set by The Act and the precise length of time we retain your information varies depending on you individual circumstances.

### Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [itsupport@sigairhandling.nl](mailto:itsupport@sigairhandling.nl) or [steven.godfroid@sigairhandling.be](mailto:steven.godfroid@sigairhandling.be). Under certain circumstances the Act gives you the right to erasure, to restrict processing, to data portability, to object to processing and to rectification.

The Act also gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Access request from the 25 May 2018 are free of charge, however where the request made is excessive or manifestly unfounded, we may charge a 'reasonable fee'. This fee will cover the administrative costs of providing you with details of the information we hold about you. Access request will be responded to within one month from date of receipt and, if required, we are in receipt of further information to locate the information requested.

If you would like a copy of your information, believe that any information we are holding on you is incorrect, incomplete, retained for longer than required or have any other issues or queries regarding your rights, please contact:

The IT Manager  
Tielstraat 19  
5145 RC Waalwijk  
The Netherlands  
Email: [it@sigairhandling.nl](mailto:it@sigairhandling.nl) or [steven.godfroid@sigairhandling.be](mailto:steven.godfroid@sigairhandling.be)

### Complaints

We take all concerns relating to the processing of personal data seriously and will endeavour to resolve your concerns as quickly as possible. If you have a complaint relating to the way in which we have processed your personal data please contact the Data Protection Manager in the first instance via the contact details above. If we fail to handle your personal data correctly or resolve a complaint, within a reasonable timescale, you have the right to contact The Information Commissioners Office who can be contacted via the following:

Tel: 0303 123 1113  
Website: Information Commissioner (ICO)  
Address: Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF