

# **PRIVACY STATEMENT 2022**

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# 1 Introduction

IMPCO Technologies Sarl, whose head office EControls Europe bv is located in Delfgauw, The Netherlands, is committed to complying with the General Data Protection Regulation ("GDPR"). Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better service.

This Privacy Statement is to inform you what kind of information we collect, how we use and protect it, who we share your information with, why and on what basis and how you can access this data, change or delete it.

This Privacy Statement applies to the personal data we receive from you or a third party within the context of our service provision or our business operations. We will also collect personal data from you when you visit our websites.

We will exclusively use your personal data for the purposes listed in this Privacy Statement, and not for any other purposes, unless the further processing of the personal data is compatible with the purposes for which this data was originally processed.

## 2 Customer relationship

### 2.1 Collection of personal data

We will collect personal data when you contact us, when you have or want to have an established customer relationship with us, within the context of our service provision and/or within the context of our business operations.

We collect the following data from you:

- Last name and first name
- Business address
- (Business) email address
- (Business) telephone number
- Job title and company name
- Invoicing data
- Other information that is necessary to provide our products and/or services

### 2.2 Why do we collect personal data? Purposes

We may process your personal data for the following purposes:

#### Customers / future customers:

- In order to be able to provide you (or your company) with the required products / services;
- In order to be able to invoice for our products / services;
- In order to be able to improve our products / service provision and develop and market new products / services;
- In order to comply with applicable legislation and follow up on court orders and/or instructions from other competent authorities. In order to be able to exercise our rights resulting from the agreement; this includes, but is not limited to, transferring the file to a bailiff, seizure or bringing legal proceedings.

Suppliers / business contacts:

- In order to be able to request information on your service provision/products or in order to be able to respond to the information sent by you;
- In order to be able to give you an assignment;
- In order to be able to pay your invoices;
- In order to comply with applicable legislation and follow up on court orders and/or instructions from other competent authorities;
- In order to be able to exercise our rights resulting from the agreement; this includes, but is not limited to, transferring the file to a bailiff, seizure or bringing legal proceedings.

## 2.3 Legal grounds for processing

Depending on the specific processing operations, we use the following legal grounds for processing your personal data:

Agreement

If you (or your company) have entered into an agreement with us, we will require certain data from you, including your name, contact details, data required for invoicing and information required to be able to supply the service.

Legitimate interests

If we have any legitimate interests in the processing of your personal data, we may process your data for these reasons. We will not process your personal data when your interest in not having the data processed carries more weight.

It is also part of the regular business activities of IMPCO Technologies to keep you informed of any news items and relevant products and services, for example. We will do so via the newsletter.

We may request your feedback in order to be able to improve our products and/or service provision. IMPCO Technologies also may have an interest in sharing your personal data with third parties, including process servers, or in taking other legal measures to protect our interests.

You are entitled to object to the processing of your personal data as specified above. Please contact us if you wish to object. If you do so, we will cease the processing of your personal data, unless there are compelling and legitimate grounds as a result of which our interest in the processing of your data overrides your interest in having us cease the processing operations. When you request us to cease the data processing, you may no longer be able to have full access to our services.

Permission

In some cases, we will ask for your permission before we process your data. You are entitled to withdraw your permission at all times. We will stop processing your personal data in the relevant case.

## 2.4 Retention period

We will not store your personal data longer than is necessary for the purpose of data processing. We use the following retention periods, unless there are other (legal) reasons to store the data for a longer period of time:

- Contracts: contract information will be stored for seven years from the date on which the commercial relationship has ended;
- Customer relationship: your contact details will be stored for five years from the date the commercial relationship has ended;
- Administrative data: tax related data will be stored for seven years;
- Suppliers: your data will not be stored for longer than five years from the date on which the commercial relationship has ended.

## 3 Our Websites

### 3.1 Collection of personal data

We collect personal data via our websites. Data we collect from you are:

- When you contact us by filling in the web form or send us an email we can ask for your name, email address and phone number to contact you, in order to answer your question;
- When you visit our website, we collect data about your visit and click behaviour on our website.

We collect technical data by means of cookies. Technical data includes the IP address.

### 3.2 Why do we collect personal data? Purposes

We process your personal data for the following purposes:

- When you send us an e-mail message or fill in the web form: to respond to your questions or comments;
- When you visit one of our websites: to analyse and improve our services, including the measurement and analysis of statistical data and the generation of user statistics.

### 3.3 Legal grounds for processing

#### *Legitimate Interest*

If we have certain legitimate interests in the processing of your personal data, we may process your data for these reasons, except where such interests are overridden by your interest not to process the data.

Answering questions is part of our regular business activities. The information you provide for this is therefore necessary to answer your question(s). IMPCO Technologies also has an interest in a well-functioning website, tailored to the wishes of the visitor of the website.

You have the right to object to these processing operations. If you wish to object, please contact us. In that case, we will cease processing your personal data, unless there are compelling, justifiable reasons why our interest in processing is greater than your interest in stopping processing. You may not be able to make optimal use of our services if you request us to cease processing.

### 3.4 Retention period

We will not store your personal data longer than is necessary for the purpose of data processing. We use the following retention periods, unless there are other (legal) reasons to store the data for a longer period of time:

- Answering your questions: your name and contact details are not kept longer than necessary and in any case not longer than a year unless a customer relationship has been established;
- Technical reasons, such as website optimization: technical data are stored in an anonymous form as far as possible and are used as long as necessary to optimize the website.

## 4 General

### 4.1 To whom do we supply your data?

Your data will be mainly visible and processed by IMPCO Technologies staff members. But it is also possible in some cases that information about you, including personal data, is shared with other entities of the IMPCO TECHNOLOGIES group within the framework provided by this Privacy Statement. We may communicate your personal data to our subsidiaries, or any other member companies of the group.

We may share your personal data with the following categories of third parties:

- Professional advisers such as lawyers and accountants;
- Governments or (regulatory) bodies;
- Third parties to whom we outsource certain services, including: document-processing services, confidential waste disposal services, IT system or software suppliers, IT service providers, document and information storage providers;
- Service providers who assist us in making analyses, including Google Analytics;
- Postal, email or courier services.

Please note: this list is not complete and there may be other examples where we share your personal data with other parties in order to optimise our service provision.

### 4.2 Who processes your personal data?

We may deploy third parties – processors – in order to be able to supply our services, such as IT service providers and software suppliers, who process personal data on behalf of us and who are commissioned by us. We will ensure an appropriate level of protection is in place for your personal data and conclude a processor's agreement with each processor, in which we lay down the obligations of both parties.

### 4.3 Transfer of data

We keep your personal data in the European Union/EER. If your personal data is transferred outside the EER, IMPCO Technologies provides appropriate safeguards on the condition that enforceable data subject rights and effective legal remedies for data subjects are available. On request, we can provide you the list of countries where we store your data and those where they pass occasionally.

### 4.4 Changes to our Privacy Statement

This Privacy Statement could be amended in the event of changes to our service provision or changes to privacy laws. We advise you to regularly consult the Privacy Statement.

### 4.5 How can you exercise your rights?

You have a number of rights under privacy legislation (this includes the GDPR). These rights are specified in article 12 – 23 of the GDPR and in related legislation. In any case, you have the following rights with regard to your personal data:

- The right to request access to your personal data (including the right of a copy);
- The right to request the correction of your personal data if it is not correct (rectification);
- The right to request removal of your personal data;
- The right to request the restriction of your personal data;
- If we process your personal data based on our legitimate interests: the right to object to the (further) processing of your personal data (resistance);
- If we process your data on the basis of your permission or on the basis of an agreement we have concluded with you: the right to request transfer of personal data (data portability).

If you wish to exercise one or more of the rights specified above, you can contact us via our Privacy Officer, Mrs Judith Reijntjens, [privacy@econtrols-europe.com](mailto:privacy@econtrols-europe.com) or on +31 15 274 2550.

#### 4.6 Right to complain

Do you disagree with a decision made by us, for example the decision not to remove your personal data? Then you will be able to use one or more of the following options:

- You can contact us: in this case, we will try to find a solution together with you;
- You can submit a complaint: you have the right to submit a complaint to the French Data Protection Authority: <https://www.cnil.fr>;
- You can request mediation: you can ask the French Data Protection Authority to mediate between you and us: <https://www.cnil.fr>;
- You can litigate: you have the right bring an action before a competent court in order to settle the dispute.

#### 4.7 Security of personal data

We will ensure the personal data we have received from you is adequately secured, in line with applicable legal requirements and guidelines.

#### 4.8 Identity of the person collecting the data and contact

The responsibility for the processing of personal data lies with: IMPCO Technologies Sarl, a company specializing in the business sector of the trade of various industrial supplies and equipment, registered under the number 393 243 902, whose head office, EControls Europe bv, is located in Delfgauw (The Netherlands).

For any request concerning your personal data, you can contact the Privacy Officer:

Judith Reijntjens  
Distributieweg 9  
2645 EG Delfgauw  
The Netherlands  
Phone: +31 15 274 2550  
Email: [privacy@econtrols-europe.com](mailto:privacy@econtrols-europe.com)