

## PRIVACY STATEMENT

### About Verbruggen and this privacy statement

Verbruggen Palletizing Solutions (**'Verbruggen'**, **'we'**, **'us'**, or **'our'**), a leader in automation technology with over 30 years of experience, is dedicated to optimizing packaging process efficiency worldwide through innovative and sustainable palletizing machines. With our headquarters in the Netherlands and manufacturing and service facilities in North America (Pasco, WA, USA) and Asia (Chonburi, Thailand and Dhaka, Bangladesh), we provide extensive support to our global customer base.

This privacy policy explicitly concerns the processing of personal data by Verbruggen Palletizing Solutions as the data controller, emphasizing our dedication to safeguarding your data and clarifying how we, at Verbruggen, handle and protect your data in accordance with our mission and values. We have our headquarters at Bouwerskamp 13 in Emmeloord and we are registered in the Netherlands under Chamber of Commerce (KVK) number 57374074.

This privacy notice describes how and why we might collect, store, use and/or share (**'process'**) your information, such as:

- When you contact us through our website for information about our products or services;
- During interactions that occur as part of our sales or marketing activities;
- When processing orders and providing customer service and technical support.

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. For any inquiries or concerns regarding our privacy practices, you can contact us via [avg@verbruggen.nl](mailto:avg@verbruggen.nl) or call us at +31(0)527-620232. We are here to help ensure that your personal data is accurate and in line with your preferences.

Thank you for entrusting us with your information.

## A. What information do we collect?

*In short: we collect personal data that you voluntarily provide to us, as well as data we collect automatically through your interaction with our website and services.*

### **Personal information provided by you.**

When you use our website, communicate with us, express interest in or make use of our services, we collect the personal data you provide. The personal data collected varies depending on the context of your interactions with us, the purposes of those interactions, and the choices you make. Personal data we collect may include the following:

- **Contact Information:** We collect information such as your name, email address, postal address, and phone number when you interact with our services, such as when you inquire about our products, or use the website.
- **Payment information:** For purchase transactions, we collect transaction information, which may include your payment information, purchase history, and other related billing details.
- **Feedback and communication:** Any information you provide to us during communications, including feedback and contact form submissions, is collected and stored.

### **Information collected during your on-site visits**

*In short: We collect identification details for security and use video surveillance for safety on our premises.*

For security reasons, we may collect identification details as you enter our premises, such as your name, organization and vehicle number. In addition to that, we may use video surveillance on our premises for the safety and security of our employees, guests, and property.

### **Information automatically collected**

*In short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our website.*

We automatically collect certain information when you visit, use, or navigate our website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website, and other technical information. This information is primarily needed to maintain the security and operation of our website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

### **Information collected from other sources**

*In short: We may collect limited data from the organizations with whom you have shared personal data, and other outside sources.*

In order to enhance our ability to provide services to you and update our records, we may obtain information about you from other sources, such as public databases like the Chamber of Commerce trade register, business partners, data providers, and from other third parties. This

information includes names, mailing addresses, job titles, email addresses, phone numbers, user behaviour data, Internet Protocol (IP) addresses, social media profiles and social media URLs.

### **Personal data of minors**

Our website and/or service does not knowingly collect data from website visitors under the age of 16. However, we cannot check whether a visitor is older than 16. We therefore advise parents to involve themselves in the online activities of their children in order to prevent their children's data from being collected without parental consent. If you believe we have collected personal information about a minor without this permission, please contact us at avg@verbruggen.nl and we will delete that information.

## **B. How do we process your information?**

*In short: We process your information to provide, improve our services and website, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal data for a variety of reasons, depending on how you interact with our website, including:

- **Customer service and support:** Personal data is used to respond to inquiries, complaints, or to provide support. This helps improve customer experience and ensures effective after-sales service;
- **Order processing and delivery:** Personal and transaction data are necessary for processing orders, including payments, deliveries and managing customer accounts. This includes everything from preparing quotes to handling billing;
- **Product development and improvement:** Feedback and usage data can be analyzed to enhance existing products and services and develop new innovations that better meet customer needs;
- **Marketing and communications:** Personal data can be used to send marketing materials, newsletters, offers, or information about new products and services. This helps Verbruggen build brand loyalty and drive sales;
- **Compliance and safety:** Personal data may be processed to comply with legal requirements, such as tax laws or industry standards. Additionally, data is used to ensure the security of the website and business facilities, including the use of surveillance data to prevent unauthorized access;
- **Analysis and business intelligence:** Analyzing interaction data and business performance to gain insights that assist management in making strategic decisions and optimizing operations;
- **Network and information security:** Personal data can be used to ensure network security and provide protection against fraud or cyberattacks.

## **C. What legal bases do we rely on to process your personal data?**

*In short: We only process your personal data when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with*

*laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

*If you are located in the EU or UK, this paragraph applies to you.*

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal data. As such, we may rely on the following legal bases to process your personal data:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal data for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- **Performance of a contract.** We may process your personal data when we believe it is necessary to fulfil our contractual obligations to you.
- **Legitimate interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms.
- **Legal obligation:** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

#### D. When and with whom do we share your personal data?

*In short: We may share information in specific situations described in this paragraph and/or with the following categories of third parties.*

We may share your personal data in specific situations and/or with the following categories of third parties. Our sharing of personal data supports our operational needs, the delivery of our services, and compliance with legal obligations. Here are the key categories of third parties with whom we share data:

- **Logistics partners:** To facilitate the efficient transportation and installation of our palletizing machines, we share necessary logistics information and contact details with our trusted logistics partners. This ensures that our products reach our clients promptly and are installed correctly.
- **Installation contractors:** Our installation contractors play a critical role in setting up our machines at client sites. To effectively coordinate these activities, we share client contact information with contractors. This data sharing is strictly limited to what is necessary to ensure smooth installation and setup.
- **Service providers:** Technical support and maintenance are crucial for the optimal functioning of our palletizing machines. We share relevant data with service providers who assist in these areas, including maintenance schedules and system diagnostics. These providers are under strict agreements to use the data only for providing the services we require and ensuring system reliability.
- **Regulatory and legal authorities:** In instances where we are legally required to disclose data, we comply with such demands from legal or regulatory authorities. This may involve sharing information for compliance with safety standards or responding to legal processes.

- **Service and manufacturing facilities:** Our manufacturing and service facilities, located in North America (Pasco, WA, USA), South America (Argentina) and Asia (Chonburi, Thailand, and Dhaka, Bangladesh), are essential components of our supply chain. We engage in a rigorous exchange of operational data and client-specific information with these facilities to ensure they are equipped to handle our exacting manufacturing demands and service needs efficiently. These collaborations are managed under agreements that prioritize the confidentiality and integrity of all shared data, safeguarding the quality and security required for our global operations.

## E. Do we use cookies and other tracking technologies?

*In short: We may use cookies and other tracking technologies to collect and store your information.*

We only use functional and analytical cookies that do not infringe on your privacy. A cookie is a small text file that is stored on your computer, tablet or smartphone when you visit this website for the first time. The functional cookies that we use are necessary for the technical operation of our website and your own convenience. The cookies ensure that the website works properly and remember, for example, your preferences.

We also make use of analytical cookies. We use these cookies to analyse the behaviour of visitors to our website. This enables us to analyse the website. All information we collect through is anonymised and cannot be traced back to you.

We also use marketing and tracking cookies. We collaborate with third parties to display advertisements on our website or to manage our advertisements on other sites. These third parties may use technologies such as cookies to collect information about your activities on this website and other websites to provide you with advertising based on your browsing activities and interests.

Google Tag Manager helps us manage this data efficiently and securely. Google Tag Manager allows us to streamline the management of tags (snippets of code or tracking pixels) on our website without directly modifying the code. It helps us deploy and manage various tracking and analytics tools, including but not limited to Google Analytics, Facebook Pixel, and others, to understand user behaviour and improve our services.

You can opt out of cookies by configuring your internet browser so that it does not store cookies anymore. In addition, you can delete all information previously stored using your browser settings. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## F. Is your information transferred internationally?

*In short: We may transfer, store, and process your information in countries other than your own.*

Our servers are located in the EU. If you access our website from outside the EU, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by third parties with whom we may share your personal data in other countries.

If you are a resident in the European Economic Area (EEA), United Kingdom (UK), or Switzerland, the transfer of data to a third country may occur, but we emphasize that such transfers will only take place if that country ensures an adequate level of security. We strive to collaborate with our partners in a manner that prioritizes data protection, and two examples of the mechanisms we employ are adequacy decisions and Standard Contractual Clauses (SCC's).

In both cases, whether through an adequacy decision or the implementation of Standard Contractual Clauses, our commitment is to uphold the highest standards of data protection and privacy in accordance with this privacy notice and relevant legal requirements. Further details can be provided upon request.

We may share your personal data with third parties in the United States. The United States does not have an adequate level of protection. This means that the processing of your data involves additional risks. By agreeing to our Privacy Policy, you expressly consent to the sharing of your data with the United States. This consent can be withdrawn at any time.

## G. How long do we keep your information?

*In short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal data for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). Below, we outline the retention periods for different categories of personal data:

- **Personal data:** We retain personal data as long as you are actively using our service. This category includes your first and last name, telephone number, and email address, which are necessary for us to deliver our services and ensure you can be contacted as needed.
- **Data to improve user experience:** We retain data used to enhance technical services and user experience for a period of one year. This category includes your IP address, location data, information about your activities on our website, details about your browsing behaviour across different websites (e.g., as part of an advertising network), and your internet browser and device type.
- **Contact details:** We keep contact details for as long as you are actively using our services. This category is essential for facilitating our service delivery and includes a list of your contact details that may be stored through an app.

When your data is no longer needed for these purposes, or when you cease using our services, we will either delete or anonymize your personal data. If immediate deletion is not possible (for example, because your personal data has been stored in backup archives), we will securely store your personal data and isolate it from any further processing until deletion can be carried out.

## H. How do we keep your information safe?

*In short: We aim to protect your personal data through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal data we process. We protect our systems with firewalls, antivirus programs, and DDoS prevention to ensure the integrity and availability of our data. Access to personal data is carefully controlled through purpose-bound restrictions and the use of passwords, helping to ensure that only authorized personnel can access the information they need. We minimize the amount of personal data we collect and keep it only as long as necessary, adhering to the shortest possible retention periods. Additionally, where necessary, we employ encryption and pseudonymization techniques to further secure the data. We also actively monitor the practices of any organizations that have authorized access to ensure they adhere to our security standards.

## I. What are your privacy rights?

*In short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, you have rights that allow you greater access to and control over your personal data. You may review, change, or terminate your account at any time.*

In some regions (like the EEA, UK, Switzerland), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal data, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal data; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal data.

We will consider and act upon any request in accordance with applicable data protection laws.

- If you are located in the EEA or UK and you believe we are unlawfully processing your personal data, you also have the right to complain to your Member State data protection authority or UK data protection authority.
- If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

You can send a request for access, correction, deletion or transfer of your personal data or a request for the cancellation of your consent or an objection to the processing of your personal data to [avg@verbruggen.nl](mailto:avg@verbruggen.nl). To ensure that a request for access has been made by you, when you submit that request we kindly ask you to use the e-mail address known to us.

## J. Do we make updates to this notice?

*In short: Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a

notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.