### Privacy Statement Richfield Trading

# 1. Definitions

In this privacy statement, the following terms shall mean:

**Authority**: the supervisory authority as meant in article 51 General Data Protection Regulation (GDPR) and article 6 of the General Data Protection Regulation Implementation Act (GDPRIA): the Dutch Data Protection Authority;

Customer: the person with whom Richfield Trading B.V. has a business relationship;

**Controller**: The controller for the processing of personal data within the meaning of this privacy statement is Richfield Trading B.V.;

Data subject: the natural person to whom personal data relate;

**GDPR**: General Data Protection Regulation, Regulation (EU) 2016/679 of the European Parliament and the Council;

Personal data: any data regarding an identified or identifiable natural person;

**Processing of personal data**: any action or any set of actions regarding personal data, in any case including collecting, recording, organising, storing, editing, changing, requesting, using, providing by means of transmission, distributing or any other form of making available, combining, linking, as well as blocking, deleting or destroying data;

**Processor**: the party who on the basis of an agreement processes personal data for the Controller, without being subject to its direct authority;

**Special personal data**: any personal data regarding the health, religion, political views, criminal record, or sexual life of a natural person as meant in article 9 GDPR;

**Third party**: any person other than the data subject, the Controller or the Processor; or any person who, under the direct authority of the Controller or the Processor, is authorized to process personal data;

In Writing: By written letter, fax, e-mail and such other electronic means.

# 2. Contact details & identity Controller

Richfield Trading B.V. | Staalstraat 13 | 8211 AH Lelystad info@richfieldtrading.com | www.richfieldtrading.com Chamber of Commerce number: 68821557

# 3. GDPR

Controller respects the privacy of Data subjects whose Personal data are processed and ensures that the Personal data collected by or provided to Controller will be treated in confidence and processed in accordance with the applicable laws and regulations.

# 4. Categories of Personal data

Controller processes the following, general Personal data:

- Contact details, such as name(s) and address
- Email address
- Telephone number
- Payment/financial details

Controller does not process Special personal data.

# 5. Cookies

Richfield Trading B.V. uses cookies on its website in accordance with GDPR and other applicable laws. The following cookies are used:

# Functional cookies

We use technical cookies and analytical cookies to enable the visit to the website and to analyse the visit. Based on this information, we can improve our website and optimize its user-friendliness. We do not process Personal data with the use of these privacy-friendly cookies.

# 6. Purpose of Processing Personal data

Controller processes Personal data to contact its Customers and other Data Subjects for the sale and delivery of its products and/or fulfilling its obligations under the agreement with its Customers.

For the purpose of keeping Personal data up-to-date Controller processes Personal data of its Customers in its Customer Relationship Management (CRM) system.

Controller processes payment details for the sale and delivery of its products.

Controller processes Personal data to make you an offer regarding the sale of its products or services.

Controller may send newsletters to its Customers or perform marketing activities, including contacting Data subjects about its business activities.

For the purpose of registering Personal data of all or parts of its website.

### 7. Providing Personal data to Third parties

Controller shall only provide Personal data to Third parties if the transfer is in line with the description referred to in this Privacy Statement or in the event that Controller is required to do so by law, or if a statutory basis applies. Controller can also provide Personal data to Third parties in countries outside the European Union.

Controller has processing agreements in place with its Processors.

This Privacy Statement only applies to Controller and does not apply to Third parties. Controller is not responsible for the Privacy Statement of Third parties and recommends that Data subjects consult these Third parties' Privacy Statements.

### 8. Retention period

The GDPR does not give any specific period for the retention of personal data. Controller will retain Personal data no longer than necessary for the purpose of processing.

#### 9. Data subjects' rights

Data subjects have the right and the possibility to opt out of newsletters and mailings that Controller sends them. After opting out, Controller will cease to send said newsletter.

Data subjects have the right to inspect their file and the right to obtain from the Controller confirmation as to whether or not Personal data concerning him or her are being processed, and, where that is the case, access to the Personal data. Within four weeks after the request, Controller will notify Data subjects In Writing whether Personal data relating to them is being processed. Controller will provide a list of the Personal data of the Data subject who filed said request.

Data subjects have the right to erasure. Within four weeks after such request, Controller will inform Data subjects whether it will comply.

If Data subjects find incorrect data in their file, they can file a request for correction, completion, removal or blocking. This request will contain the changes to be made. Controller will inform Data

subjects within four weeks of receiving the request In Writing, whether or to what extent it will comply.

If the processing of the Data subject's Personal data takes place on the basis that the processing is necessary for Controllers' legitimate interests, the Data subject always has the option to object. All objections must be submitted In Writing. Controller assesses within four weeks of receiving the objection whether the objection is justified. If this is the case, Controller will immediately end the processing of data.

# 10. Security measures

According to the law, Controller is responsible for appropriate Personal data security measures. Only those persons who, by virtue of their function, manage the Personal data of Data subjects have access to the computers and the CRM system in which the Data subjects' Personal data are stored. The computers are equipped with the required security systems and personal access codes.

# 11. Obligation to provide information

Controller fulfils its obligation to inform Data subjects of the processing of their Personal data. Controller will do so prior to the time of Processing.

#### 12. Complaints

Data subjects who are of the opinion that the provisions of this Privacy Statement have not been complied with by Controller, may contact Controller with their complaint. Controller will in that case try to find a suitable solution to the complaint.

If the Data subject and Controller fail to come to a solution, the Data subject has the right to file a complaint at the Dutch DPA or the competent court.

#### 13. The right to modification of this Privacy Statement

Controller reserves the right to make changes to this Privacy Statement.

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