

# ARW PRIVACY POLICY

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This is the Privacy Policy of ARW. ARW is a limited liability company incorporated under Belgian law, with its registered office located at 1020 Brussels, Avenue Atomium 1 and registered with the Crossroads Bank for Enterprises under the number 0439 676 155 ("ARW" or "we").

This Privacy Policy aims to inform you about the processing of personal data that takes place through ARW's website and/or an online ordering platform. This Privacy Policy should be read together with the Cookie Policy, which can be [found here](#).

This Privacy Policy may be modified, for example in response to new features on the website or to comply with new legal, contractual or administrative obligations. We therefore encourage you to consult this Privacy Policy on a regular basis. Important changes will be announced through our website. This version of the Privacy Policy was last modified on January 30, 2024.

The information is provided taking into account the combined provisions of the following regulations:

- European Data Protection Regulation (GDPR) EU 2016/679;
- the law of July 30, 2018 on the protection of natural persons with regard to the processing of personal data published in the Moniteur belge on Sept. 5, 2018;
- European Directive 2002/58/EC (e-Privacy Directive).

For the performance of the agreement between you and ARW (hereinafter referred to as "the Agreement"), for example by registering on our platform, ordering products or consulting our website, ARW may process necessary personal data from you. Based on this data, you may be identifiable as a person. These data are therefore also referred to as "personal data". ARW is the controller of this processing.

ARW respects your privacy and ensures that you can trust ARW with your personal data. Privacy is important and so ARW wishes to inform you through these terms and conditions what happens to your collected personal data and what rights you have in this regard.

ARW may use the information it collects about you for new purposes not yet provided for in this privacy policy. In that case, ARW will notify you of the changes to its privacy policy before using your personal data for these new purposes. In doing so, you will be able to object to the use of your personal data for these new purposes.

## Who is responsible for processing your personal data?

ARW is the controller of your personal data.

## Legal bases

ARW processes your personal data on the following legal bases:

- Your consent;
- The processing is necessary for the performance of the Agreement, or to take measures at your request before the conclusion of the Agreement;
- The processing is necessary to comply with a legal obligation incumbent on ARW;
- Processing is necessary to protect your vital interests or those of another natural person;

- The processing is necessary to pursue the legitimate interests of ARW as controller or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms requiring protection of personal data;
- For the establishment, exercise or support of legal claims.

### **What data do we process?**

We do not process directly identifying data about you, such as your name, address, phone number, e-mail, VAT Number, etc., unless you provide us with your personal data yourself at :

- Filling out a contact form on any of the pages of our websites;
- Creating an account on our websites;
- Subscribing to the newsletter;
- Requesting a quote or forwarding an order form;
- Participation in a loyalty program;
- Purchase on any of our websites or on the ordering platform used by ARW;
- When you contact us directly for example by e-mail or at a personal interview;
- Participation in contests;
- Administrative and management purposes and to fulfill obligations arising from law, regulation or order of the authorities (e.g. accounting; tax formalities, administrative and accounting management, etc.), and to comply with the law, regulation or order of the authorities.

The categories of data collected are:

- identifying information (name, address, phone number, e-mail address, company number, ID card number, customer code, customer card number);
- financial data (bank account),
- personal characteristics (gender, date of birth).

We process certain non-directly identifying data when you visit our website, such as the type of browser you use, the operating system you use, your IP address, etc.

### **Why do we process your data?**

*To carry out the Agreement between ARW and you and/or based on your authorization for proper fulfillment of your request.*

In the context of carrying out an order, or in the context of registering on our platform, etc., we need to process your data for the proper performance of the purchase agreement concluded between us. After your first purchase and through your continued presence on the platform, we retain your data so that subsequent orders can be made more easily by you.

*For technical and functional management of the website and our computer systems*

We process personal data for the technical and functional management of our website and computer systems and to ensure that the website is easy to use. Through your data, we can track how our website is used and improve its content and layout. This data also allows us to adequately secure our website.

To do this, we may process data such as your IP address, the pages you visit, the browser you use, the websites you previously visited, and the time and duration of your visit. We do this, for example, by using cookies. More information on the use of cookies can be found in our cookie policy.

We process this data based on ARW's legitimate interest in providing a well-functioning and secure website.

#### *To keep you informed of our services and activities and for direct marketing*

We process your personal data when you wish to be kept informed about our activities, by subscribing, for example, to an ARW newsletter), invitations to collection presentations and or other events. We also use this data to inform you about what might be of interest to you. For this purpose we may process data such as your name, your position, your company name, your address, your e-mail address, your preferred language and specific products or brands you are interested in.

We process this data either on the basis of your consent or on the basis of ARW's legitimate interest in keeping its clients informed about its activities and services. You are free to choose whether to provide us with your personal data for this purpose and you have the right to withdraw your consent at any time.

#### *To answer your questions*

If you ask us a question by phone, using the contact form on the website or by email, we will process your personal data to answer that question.

For this purpose, we may process data such as your name, your contact details, your correspondence with ARW and any other personal data you provide us that may be relevant to answer your query. We process this data based on your consent. You are free to choose whether to provide us with your personal data and you have the right to withdraw your consent again at any time.

#### *To contact as part of a selection and recruitment process.*

When you apply through the website, we process your personal data in order to contact you and to follow up on your application request.

For this purpose, we may process data such as your name, your contact information, correspondence to and from ARW, your CV and other documents you provide to us.

The processing of your personal data for this purpose is based on your request to take steps to enter into an agreement.

#### **Who has access to your personal data?**

ARW uses third parties to perform certain (processing) activities, such as hosting the website, organizing mailing campaigns, etc. ARW concludes a processing agreement with the parties that have access to personal data for the performance of their services. The agreements between ARW and the aforementioned processors contain the necessary guarantees regarding the confidentiality of personal data and compliance with privacy legislation.

We do not provide personal data to other parties, except as may be required by law or court order. ARW may be required to disclose all or part of your personal data if:

- A legal obligation and/or order from a judicial or administrative authority exists;
- This proves necessary for the performance of the Agreement;
- ARW deems this necessary to safeguard its rights;
- You have provided prior specific and written consent.

We use software from an external service provider to send our mailing campaigns. As a result, your data may be processed outside the European Economic Area. Transfer of personal data outside the EEA may be subject to **Standard Contractual Clauses** ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)). If required by applicable data protection law, we will contact you and ask for your consent to a data transfer outside the EEA, informing you of any potential risks. You are free to consent or refuse to allow such a transfer to take place.

### **How do we secure your personal data and how long do we keep your personal data?**

ARW takes reasonable security measures to protect your personal data from destruction, loss, alteration or any other unauthorized processing.

If, despite these efforts, there is still a breach in connection with your personal data that is likely to pose a high risk to the rights and freedoms of natural persons, ARW will communicate this without delay, unless:

- Appropriate technical and organizational protection measures have been taken by ARW and these measures have been applied to the personal data affected by the breach;
- Subsequent measures have been taken by ARW to ensure that the high risk is unlikely to recur;
- Notice would require a disproportionate effort by ARW, in which case a public notice or similar measure would suffice.

Once ARW has knowledge of a breach, ARW will provide you with at least without unreasonable delay:

- The nature of the personal data breach;
- The measures proposed or taken to address the breach and mitigate any adverse effects;
- The name and contact information of the data protection officer or other point of contact;
- The likely consequences of the breach.

ARW will not retain your personal data longer than necessary for the purposes for which it is held.

### **How can you exercise your rights?**

You have the right to request access to the personal data processed by ARW free of charge, to have these data corrected, deleted or blocked. You may also request the portability of your data and you may oppose, without justification in the case of direct marketing or justification in other cases, the processing of your personal data. You may also restrict the processing carried out by ARW in specific circumstances.

Where the processing of your personal data is based on your consent, you may withdraw it at any time. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before the withdrawal.

You may send your request under the above rights to [dataprotection@ARW.be](mailto:dataprotection@ARW.be) or by mail to the above address. ARW cannot process your request without proof of your identity. Please note that applicable law may impose conditions on the exercise of the above rights.

You also have the right to lodge a complaint with the supervisory authority, which is the Data Protection Authority. It can be reached by mail at the address at 1000 Brussels, Rue du Printing Press 35 and by e-mail at the following address: [contact@apd-gba.be](mailto:contact@apd-gba.be).

### **Questions?**

If you have further questions about this website or this Privacy Policy, you may also contact [dataprotection@ARW.be](mailto:dataprotection@ARW.be).

# ARW COOKIE POLICY

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This is the Cookie Policy of ARW. ARW is a limited liability company incorporated under Belgian law, with its registered office located at 1020 Brussels, Avenue Atomium 1 and registered with the Crossroads Bank for Enterprises under the number 0439 676 155 ("ARW" or "we").

The Cookie Policy aims to inform you about ARW's use of cookies. This Cookie Policy should be read together with the Privacy Policy, which can be found [here](#).

This Cookie Policy is subject to change, for example in response to new features on the website. We therefore recommend that you consult this Cookie Policy on a regular basis. Important changes will be announced via our website. This version of the Cookie Policy was last amended on January 30, 2024.

## ARW Cookies

When you visit our website, we collect information by automated means using cookies. Other technologies are also used such as, for example, pixel tags, browser analysis tools, server logs and web beacons for the purposes described in this Cookie Policy. The information provided below about cookies also applies to those technologies.

## What are Cookies?

Cookies are small text files that are placed on your browser, your computer or your mobile device. The website stores cookies on your device in order to remember information about you, such as your language preference or login information, so that your device is recognized when you revisit the website. Cookies can serve several purposes: ensuring that the website takes into account the user's preferences by, for example, remembering certain preferences, collecting statistical data, customizing content, etc.

## Which Cookies?

We use both *first-party* cookies and *third-party* cookies (third-party cookies), session cookies and persistent cookies:

- First-party cookies are cookies placed by ARW itself on its website.
- Third-party cookies are cookies set by other parties (i.e., cookies from a different domain than where you are located, for example, Google Analytics cookies).
- Session cookies are deleted after the user closes the browser.
- Persistent cookies are stored on the user's device for a certain period of time.

We use cookies and other tracking technologies for the following purposes:

### *Strictly necessary cookies*

Strictly necessary cookies are required for the website to function properly and cannot be disabled in our cookie banner. In most cases, these cookies are only used in response to an action by you that essentially requests a service, for example, registering your privacy settings, logging into the website or filling out a form. These cookies are placed directly on your browser by ARW based on our

legitimate interest in providing a well-functioning and secure website. You can set your browser to block these cookies or to alert you to these cookies, but some parts of the website will then not work. You can disable these cookies by changing your browser preferences.

### *Functional cookies*

Functional cookies enable the website to offer additional features and personalized settings. These cookies are placed directly on your browser by ARW based on our legitimate interest to provide a well-functioning and secure website. You can set your browser to block these cookies or to alert you to these cookies. If you do not allow these cookies, some of our services may not work correctly. You can disable these cookies by changing your browser preferences.

### *Performance Cookies*

Performance cookies allow us to count visitors and track their origins so that we can analyze and improve the performance of our website. These cookies give us information about the use of our website and help us optimize our website. They help us understand which pages are most and least popular and how visitors move throughout the site. All information these cookies collect is aggregated. If you do not allow these cookies, we will not know when you have visited our site. These cookies are set based on your consent. You can withdraw your consent at any time.

### *Targeted cookies*

These cookies may be set by our advertisers on our website. They may be used by those companies to compile a profile of your interests and show you relevant ads on other websites. They do not store personal information directly, but they are based on unique identifiers from your browser and Internet device. If you do not allow these cookies, you will see fewer ads targeted to you. These cookies are set based on your consent. You can withdraw your consent at any time

## **How to Delete or Block Cookies - Change Settings ?**

We use cookies on our website to improve functionality and performance and to analyze traffic to the website. You can accept all cookies, reject all cookies or change your cookie settings. Those settings can be changed directly on our website by our cookie banner, or by next page of our website.

If you want to block cookies, delete existing cookies or change your cookie settings, you can always do this through your browser settings as well. These settings can be found in the "options" or "preferences" menu of your Internet browser. For example, the hyperlinks below provide further instructions on how to disable cookies on certain browsers and/or how to delete cookies:

- [Internet Explorer Cookie Preferences](#)
- [Cookie preferences Microsoft Edge](#)
- [Cookie preferences Firefox](#)
- [Cookie preferences Chrome](#)
- [Cookie preferences Safari](#)

More information on deleting and blocking cookies can be found on the website: [All about cookies.](#)

However, please remember that if you do not accept certain types of cookies or if you disable cookies, certain parts of the website or some elements may not be accessible and/or may not be displayed as well. You may also be unable to use certain applications, and/or some parts of our website may take longer to work or may not function properly.

## **The rights of data subjects**

Certain data we collect from you through cookies and other technologies may be linked to you, and allow us to identify you as a natural person. Consequently, this data qualifies as personal data, making our Privacy Policy applicable to the processing of this data by our cookies.

You can find your rights that you can exercise as a data subject, including your right to object in case your data is used for direct marketing purposes, in our Privacy Policy.

## **Retention period of personal data**

Certain data we collect from you through cookies and other technologies allow us to identify you as a natural person or can be linked to you. Consequently, this data qualifies as personal data, making our Privacy Policy applicable to the processing of this data by our cookies.

The retention period of this collected personal data may differ from the retention period (lifetime) of the cookie. We never keep personal data longer than necessary for the purpose of processing for which the data was collected.

You can find more information about this in our Privacy Policy.

## **Transfer of personal data**

ARW itself does not transfer (personal) data to parties located in countries outside the European Economic Area (EEA). Certain third parties (e.g. Google) relied upon by ARW, who have access to (personal) data collected by the cookies, may transfer your (personal) data to a country outside the European Economic Area (e.g. to the United States). Transfer of personal data outside the EEA may be subject to Standard Contractual Clauses ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)). If required by applicable data protection law, we will contact you and ask for your consent to a data transfer outside the EEA, informing you of any potential risks. You are free to consent or refuse such a transfer. For more information about this transfer, please refer to the privacy and cookie policies of the respective third parties.

You can always withdraw your consent to the setting of these cookies. If you use Google Chrome, you can also always install the [Google browser extension](#) that provides an opt-out for Google cookies.

## **Questions?**

If you have further questions about this website or this Cookie Policy, you can always contact us by sending an email to [dataprotection@ARW.be](mailto:dataprotection@ARW.be)