

Privacy statement Embrosa

Introduction

Embrosa takes your privacy very seriously and shall process and use your personal data in a secure way. In this Privacy Statement we will explain which data we process, with whom we share the data, and why we share the data. In addition, the Privacy Statement provides more information about your rights with regard to our processing of your personal data. Please read this Privacy Statement carefully. Should you have any questions, please contact us at support@embrosa.com.

Who is Embrosa?

Embrosa is the private limited (Company) (besloten vennootschap) Embrosa, with its registered office in (5928 NL) Venlo at Kazernestraat 17, listed in the Commercial Register of the Dutch Chamber of Commerce under number 66026334. Embrosa is the controller with regard to the processing of your personal data by Embrosa.

Sharing your data with third parties and for commercial purposes

We give Brands (brands, suppliers and/or distributors of brands) access to personal data such as your name, the name of your company, and your location. This enables us to offer you the App at no cost and/or to participate in hyperlocal campaigns.

If you select a Brand in the App and indicate that you wish to receive messages from that Brand, or in the event that you wish to participate in a hyperlocal campaign, please be aware that we share personal data with this company.

If you click on a Content Item or Advertisement in the App, please be aware that we share personal data with this company.

By selecting Brands, clicking on Content or Advertisement in the App and/or participating in a hyperlocal campaign you explicitly consent to sharing your personal data with these Brands.

We may use your personal data for commercial purposes, e.g., to inform you about our services or relevant products and services of carefully selected organizations. In

this case you will be informed either via the App or your registered (Company) Email address.

Your personal data are also used for market research and for the optimization of our services. In this context, your personal data is anonymized and cannot be traced back to you.

Accessing, changing or deleting your personal data

At any time you may request us to give access to your personal data or to delete your personal data.

It is possible that you only want to stop using the App. If this is the case, you may choose for certain Brands to keep your data because you sell their products. Since we cannot be certain about this, you are responsible for the deletion of your data stored by Brands. You will need to request the individual Brands to delete your personal data.

How does Embrosa use your personal data?

Underneath you will find an overview of the purposes for the processing of your personal data. You will also find a specification of which data Embrosa uses for that specific purpose, the legal justification, and the amount of time Embrosa keeps this data. For clarity's sake, we have categorized the purposes.

Services, customer management, and (financial) administration

Purpose: Administration

Information: (Company) name, (Company) address, (Company)
(Company) Email, (Company) Phone number

Legal basis: Legal obligation

Storage period: As long as necessary for this purpose

Purpose: Services, (including, but not limited to using the App and participating in a (hyperlocal) campaign)

Information: (Company) Name, (Company) Address, (Company) (Company) Email, (Company) Phone Number, Customer file data, Profile photo, (Company) Logo, (Company) photos and/or videos, Data necessary to provide the service, Data generated by the service

Legal basis: Necessary for the delivering the service

Storage period: As long as necessary for this purpose

Purpose: Handling complaints

Information: (Company) Name, (Company) Address, (Company) Email, Phone Number, Customer file data, Data necessary to provide the service, Data generated by the service

Legal basis: Necessary for handling complaints

Storage period: As long as necessary for this purpose

Purpose: Invoicing

Information: (Company) Name, (Company) Address, (Company) Email, Phone Number, Customer file data, Data necessary to provide the service, Data generated by the service

Legal basis: Necessary for sending invoices

Storage period: As long as necessary for this purpose

Purpose: CRM

Information: (Company) Name, (Company) Address, (Company) Email, Phone Number, Username, Location, Order history, Social media account, Browser, OS, User ID, Phone, Profile photo, (Company) Logo

Legal basis: Legitimate interests

importance: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: Job application

Information: Name, (Company) Email, Phone, Address, Profile photo, Resume

Legal basis: Legitimate interests

importance: Commercial interests

Storage period: As long as necessary for this purpose

Marketing

Purpose: Direct marketing

Information: Name, (Company) Email, Phone, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: Newsletter

Information: (Company) Name, (Company) (Company) Email, Language, Industry

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: Retargeting

Information: (Company) Name, (Company) Email, Phone, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: Social media marketing

Information: (Company) Name, (Company) Email, Phone, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: Behavioural targeting

Information: (Company) Name, (Company) Email, Phone, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: Loyalty program

Information: (Company) Name, (Company) Email, Phone, Online behaviour, Interest in a product, Social media account, User ID, Order history, Billing address Legitimate interests

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Website

Purpose: Website analytics

Information: Online behaviour, Location

Legal basis: Legitimate interests

Interest concerned: Commercial interests

Storage period: As long as necessary for this purpose

Purpose: A/B testing
Information: Online behaviour, Location
Legal basis: Legitimate interests
Interest concerned: Commercial interests
Storage period: As long as necessary for this purpose

Purpose: Account
Information: (Company) Name, First Name, (Company) Address, (Company) Email, Username, User ID, Message content
Legal basis: Necessary for the performance of a contract
Storage period: As long as necessary for this purpose

Purpose: Chat feature
Information: (Company) Name, First Name, (Company) Address, (Company) Email, Username, User ID, Message content
Legal basis: Necessary for the performance of a contract
Storage period: As long as necessary for this purpose

Security and fraud prevention

Purpose: data security
Information: (Company) Name

Legal basis: Necessary for the performance of a contract

Storage period: As long as necessary for this purpose

How did we obtain your personal data?

Embrosa has obtained your data because you have provided this data to us, and because Embrosa has obtained your information from third parties. These third parties are: publicly accessible sources such as the Trade register of the Chamber of Commerce etc.

What are your rights?

Under the GDPR you have a number of rights with regard to your data and the processing thereof:

Access

You may access your personal information and make any necessary changes in your account. If you would like to see which personal data Embrosa has obtained about you, you may exercise your right of access by submitting a request to Embrosa.

Making changes

If you wish to make changes to the personal information that you have seen as a result of a request for access and you are unable to make the changes yourself in your account, you may request that Embrosa makes these changes for you. You may request that Embrosa modifies, corrects, supplements, erases or shields your information.

Restriction of processing of personal data

You also have the right, under certain conditions, to ask Embrosa to restrict the processing of your personal data.

Right to object

If processing of your data takes place on the grounds of 'legitimate interest' by Embrosa or a third party, you have the right to object to that processing.

Portability of data

You have the right to obtain your personal data from Embrosa. Embrosa will provide this in a structured and commonly used format, which can easily be opened using commonly used digital systems.

Withdrawing consent

When the legal basis for a particular processing is your explicit consent, you have the right to withdraw that consent. This does not affect past processing, but does mean that we will no longer be allowed to process this data in the future. It may also result in Embrosa no longer being able to provide you with certain services.

Response from Embrosa

A request can be sent to support@embrosa.com. Embrosa will comply with your request as soon as possible and in any case no later than one (1) month after Embrosa has received such a request. If Embrosa rejects your request, we will indicate in our reply why the request was rejected.

Recipients of your personal data

Your data may be transmitted to:

- Data processors
- Parties that are involved in the execution or fulfillment of an agreement between you and Embrosa
- Brand owners, distributors, suppliers and resellers of products our users sell

It is possible that Embrosa is required to submit your data to a third party, for example to fulfill a legal obligation.

Transfer to third countries or international organizations

Our database is in the European Union. However, It may be necessary, for instance, for technical and operational reasons, to transfer your (personal) data to affiliates of Embrosa located outside the European Economic Area. Many Brands for which we deliver content are for instance located outside the European Union. Also, please take into account that your personal data is shared with Brands and processors of these Brands may also have access to your data.

By selecting Brands in our App you explicitly consent to sharing your personal data with these Brands, even if these Brands are located outside the European Union or if their data processing takes place outside the European Union.

Due to the possibility that the regulations in the area of privacy protection do not offer the same protection as within the European Economic Area, Embrosa will use an agreement such as the standard contractual clauses for the transfer of personal data to processors established in third countries which do not ensure an adequate level of data protection, as adopted by the European Commission from time to time, or any other similar agreement consistent with and compliant under the GDPR to protect your privacy as much as possible.

What are cookies and how does Embrosa use them?

Cookies are small pieces of (text) information that are sent to your browser when you visit a website and then stored on the hard disk or in the memory of your device. Our Cookie Statement ([found here](#)) describes the cookies used by Embrosa B.V.

Can changes be made to this Privacy Statement?

This Privacy Statement is subject to changes. We, therefore, advise you to regularly read the Privacy Statement for any such changes.

Questions, remarks, and complaints

If you have any questions regarding this Privacy Statement or the way in which Embrosa uses your data, you can send an e-mail to support@embrosa.com. If you have a complaint about the way your data is processed, please send an e-mail to support@embrosa.com. Furthermore, you always have the right to contact the

competent national data protection authority. In The Netherlands, this is the Autoriteit Persoonsgegevens.