

PRIVACY AND COOKIE POLICY HAMANN INTERNATIONAL LOGISTICS NV AND HAMANN INTERNATIONAL SERVICES NV



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I. INTRODUCTION

1. In this Privacy and Cookie Policy (hereinafter "**Policy**") will be explained how HAMANN INTERNATIONAL SERVICES N.V. and her subsidiaries (hereinafter '**HAMANN**', collects, uses and processes personal data related to (i) the Users of www.hamann.be (hereinafter "**Website**"); and (ii) her Clients, Applicants, Suppliers and other Business Partners, and/or those who make use of other whether or not online HAMANN services, including contact HAMANN via e-mail, telephone or other means of communication (hereinafter '**You**').

Personal data (hereinafter "**Data**") contains any information relating to you as a natural person – even when there can only be indirect identification.

2. HAMANN cares about the protection of Your privacy. HAMANN therefore treats and protects your data in a lawful, adequate and transparent manner.

The collection and processing of personal data is governed by strict conditions, enforced by the law. While processing your data, HAMANN acts in accordance with the Belgian Law of 8 December 1992 and the European Regulation nr. 2016/679 of 27 April 2016 concerning the protection of personal data (known as '**GDPR**' – **General Data Protection Regulation**), or any amendment to them. More information concerning data protection can be obtained at the Belgian Commission for the protection of privacy, since 25 May 2018 called the data protection authority.

3. We kindly invite You to read this policy carefully in order to fully understand the way HAMANN handles your personal data.
4. The visit and use of our Website and other online HAMANN services, creating an account and/or sending your resume as an applicant, implies Your explicit acceptance (by sharing your data, or by opt-in) with this Privacy Policy. Meaning that you agree with the way HAMANN processes Your personal data.
5. This Policy can be updated from time to time. The most recent version of the Policy will be available at the Website. We will inform you through the normal means of communication when significant changes have been made.

II. WHO IS THE DATA CONTROLLER?

1. HAMANN takes responsibility of your personal data as a "**data controller**". The specific company data are the following:

Hamann International Logistics NV

Vantegemstraat 3

B - 9230 Wetteren

Telephone: 09/333 77 77

E-mail: info@hamann.be

Company number: BTW BE 0873604566

Hamann International Services NV

Vantegemstraat 3

B - 9230 Wetteren

Telefoon: 09/333 77 77

E-mail: info@hamann.be

Ondernemingsnummer: BTW BE 0808441451

2. HAMANN is therefore your interlocutor and accountable for the processing of your data towards the competent authorities.
3. HAMANN can rely upon specialized service providers to process your personal data on behalf of Hamann in accordance with this Privacy Policy. Only the strictly needed data will be given to these companies (hereinafter: '**Processors of HAMANN**').

III. WHICH CATEGORIES OF DATA ARE PROCESSED BY HAMANN?

1. HAMANN can process data and information that has been sent by you or was provided by third parties insofar these are necessary or useful for the functioning of HAMANN.

We start with the definition of personal data:

Personal data: any information relating to an identified or identifiable natural person ('the data subject'); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

For example: Name, address, email address, account numbers, IP address...

In order to inform you as best as possible, this Privacy Policy contains an overview of the categories of personal data that can be processed (this overview is not exhaustive, other kinds of personal data can be processed if this is needed). In this overview the context in which the personal data are collected or being processed will be given. This overview should be read together with the description of purposes for which HAMANN processes personal data.

Category	Examples	Context
1/ Website visitors	IP address	Providing online services like support and taking care of and improving the Website or other online HAMANN-services.
2/ Customers	First- and last name, e-mail address, nationality, (mobile) phone-number, address, including the Data necessary for any additional services depending on the specific contractual arrangement between the Customer and HAMANN and including Data necessary for granting benefits.	These are the usual requested customer data, added with any additional Data in relation to additional services requested by the customer and including Data necessary for granting benefits.
3/ Suppliers	First and last name, e-mail address, nationality, (mobile)phone number and address. Including the personal data necessary for any additional services depending on the specific	These are the usual requested supplier data, added with any additional data in relation to additional services requested by the Supplier.

	contractual arrangement between the Supplier and Hamann	
4/ Job Applicants	First and last name, e-mail address, nationality, date of birth, phone number, address, previous career, studies, ...	The applicant's details are kept by saving his or her CV.
5/ Social media	Your LinkedIn Profile, the messages you send to us through Facebook	When you like our Facebook page or post, or send us a message through Linked-in.
6/ Visitors of our offices	First and last name, e-mail address, possibly a company name	When You visit our offices for a meeting
7/ Cookies – Users of the Website	Data on clicking and viewing behaviour of the User, devices of the User, IP-address, type of internet browser, type operating system or preferences.	This information is gathered by means of cookies. More on cookies in article IX.

2. Hamann does not processes data that reveal race or ethnic background, or political beliefs, religious beliefs, membership of a union, sexual orientation, genetic or biometric data or medical data. Only during any selection procedure, some of these categories of Data can be issued explicit and voluntary by You.

IV. FOR WHICH PURPOSES PROCESSES HAMANN YOUR PERSONAL DATA?

1. HAMANN collects and processes your personal information for the next purposes. HAMANN also makes sure that only Data necessary and relevant for these purposes are processed.

The definition of processing is the following:

Processing: any operation or set of operations which is performed upon personal data or set of personal data, whether or not by automated processes, such as the collection, recording, organizing, structuring, storing, updating or changing, retrieving, consulting, using, providing by forwarding, distributing or otherwise making available, aligning or combining, blocking, deleting or destroying data;

For example: When you save or store a document containing the details of a company's contact persons (address book, e-mails, quotations, orders, etc.), this is a processing of personal data.

Category	Processing purposes
1/ Website Visitors	Inclusion of personal data in anonymous statistics, from which the identity of specific persons or companies cannot be ascertained, with the legitimate interests of HAMANN as a legal basis to continually improve its website and services.
2/ Customers	Customer data – including Data necessary for additional services and depending on the specific contract with the client- for the purposes of executing the contract or maintaining customer-relationship – including Data necessary to grant benefits based on the legitimate interests of HAMANN.
3/ Suppliers	Suppliers data – including Data necessary for additional services and depending on the specific contract with the client - for the purposes of executing the contract or maintaining customer-relationship.
4/ Job Applicants	For the purposes of assessing a candidacy for current or future recruitment
5/ Social Media	Information we collect from our social media channels in order to follow up on any messages or requests directed to us.
6/ Visitors of our offices	Data filed when visiting our offices, will be used out of security reasons (we have to verify the exact number of persons in case of an emergency). Furthermore we use Your Data to and in order to welcome you to our offices by displaying your name on our welcome board when you are a (potential) client.
7/ Cookies – User of the Website	<i>Infra</i> artikel IX.

2. HAMANN may process your personal electronic contact information (ie your mobile telephone number and e-mail address) to send you personal information, advertisements or proposals via direct marketing or newsletters. In this case, HAMANN first asks for your specific permission.

V. WITH WHOM DOES HAMANN SHARE YOUR PERSONAL DATA?

1. HAMANN handles your data with the utmost care and will not disclose your Data to third parties, unless necessary for the performance of its assignment or to optimise the service of HAMANN.
2. For the aforementioned purposes, Hamann can disclose your personal data to the next receivers:
 - Third parties who assist HAMANN in the execution, management and control of its activities and services, for example with the online support through social media channels, IT-security and infrastructure of HAMANN",...;
 - Third parties who assist HAMANN in offering specific services and products, for example the WebApps,..;
 - It may happen that a third party is given the assignment to collect, process and / or analyse the personal data.
 - Furthermore, it may be necessary to provide the personal data to a third party so that Hamann is able to deliver a product or service you have ordered.

These third parties may only use the data for the aforementioned purposes. Any other use is not included and is forbidden. These third parties are contractual obliged to only use your Data according to the provisions of this Policy.

3. HAMANN will never provide your personal data to other third parties, unless there is prior permission and HAMANN entered into a contract with this third party containing guaranties concerning the protections of Your Data.
4. Furthermore it is possible that, if obliged to do so on the basis of a statutory provision or court order, HAMANN discloses your Data to the competent authorities.
5. Also in case of whole or partial reorganisation, transfer of activities of HAMANN or in case of bankruptcy of HAMANN, your Data can be transferred to new entities or third parties.
6. In the context of these exceptions, HAMANN shall attempt to inform you prior to the transfer of Data. However, because of technical, juridical or commercial reasons, this cannot be guaranteed.
7. Hamann stores your personal data within the EEA.
8. The personal data will also be used for direct marketing, provided you have given an additional explicit permission for this ("opt-in").

If you are already included in our mailing list for receiving marketing material in electronic form, Hamann can use your data for sending marketing related to Hamann's services.

In addition, Hamann can also pass on your data to its partners, in view of direct marketing.

This permission can be withdrawn at any time, without justification and free of charge, for example by clicking on the provided unsubscribe link, at the bottom of each promotional e-mail. You can also contact info@hamann.be.

VI. HOW LONG WILL WE HOLD YOUR DATA?

Data will be stored and processed for the period obligated or justified by law or another legal requirement. If this period is shorter than necessary for the aforementioned purposes, HAMANN will use the following periods:

Category	Duration of processing
1/ Website Visitors	During the duration of Your visit of our website. Hereafter Your Data will be included in anonymous statistics, from where the identity from specific persons or companies cannot be traced.
2/ Customers	Customer data is stored for the duration of the customer relationship and a following duration of 5 years
3/ Suppliers	Suppliers data is stored for the duration of the supplier relationship and the following 5 years.
4/ Job Applicants	Data concerning job applicants is used during the recruitment procedure and stored for the duration of 3 years after the recruitment phase has been terminated
5/ Social media	Information obtained from social media activities is used for the duration of the commercial relationship between Hamann and You, and for the 5 following years
6/ Visitors of our offices	Data of visitors of our offices is used during your visit of our offices
7/ Cookies	<i>Infra</i> artikel IX.

VII. SECURITY OF PERSONAL DATA

1. HAMANN applies strict standards to protect the personal data under its control against unauthorized or unlawful processing and against unintentional loss, destruction or damage.
2. HAMANN therefore takes technical and organizational measures such as encryption, antivirus, firewalls, access controls, strict selection of employees and suppliers, to prevent and detect inappropriate access, loss or disclosure of your personal data.
3. In the unlikely and unfortunate case that your personal data under the control of Hamann are compromised by a breach of information security, Hamann will immediately act to identify the cause of such breach and take action through appropriate remedial measures. If necessary, Hamann will inform You, as well as the competent data protection authority, of this incident in accordance with the applicable legislation.
4. If you have to establish that personal data may have been wrongly shared, lost, viruses or other malware have penetrated our system or data have been leaked in any other way, you must immediately contact the data controller. The person responsible will take the necessary steps to close the leak and make the necessary notifications.

The contact details of the data controller can be found under < II. Who is the data controller? >.

5. In order to process your personal data, we grant access to your personal data to our employees. We guarantee a similar level of protection by making contractual obligations enforceable against the employees and appointees, those obligations are similar to this Privacy Policy.

VIII. YOUR RIGHTS AS A DATA SUBJECT

1. RIGHT OF ACCES, RECTIFICATION, ERASURE, PORTABILITY OF DATA AND RIGHT TO OBJECT

1. For the purposes mentioned above you have:
 - **Right of access to and copy** your personal data. This means that you can ask HAMANN whether it processes and saves your personal data, for what purposes this data is processed, which categories of data are processed, and to whom they are communicated.
 - **A right to rectification** if you think your personal details are incorrect or incomplete.
 - **A right to erase** your personal data. At the end of the contract that you have concluded with Hamann, you have the right to ask us to stop using your data. Hamann may, however, in the context of this declaration, keep track of the personal data required for the purpose of proof of transactions. Under this right to erase, you also have the right to ask Hamann at any time to stop using your

personal data that is being processed on the basis of your permission or the legitimate interest of Hamann. Due to its legitimate interests, Hamann can still process your personal data after balancing your interests with that of Hamann, unless you decide to terminate the relationship with Hamann.

- **A right of portability of data** that you have provided to Hamann if your personal data are processed based on an agreement or on the basis of your permission to send electronic communication and this personal data is processed by means of automated processes. Under this right you can ask Hamann to send your own personal data to yourself or send it directly to another data processing officer, as far as this is technically possible for Hamann.
- You have **the right to object** to the processing of your data for the purposes stated in Article IV.4. In this event, Hamann will stop processing your personal data, unless Hamann invokes compelling, justified and heavier weighing grounds for processing that outweigh your interests, rights and freedoms, or for instituting, exercising or substantiating a legal claim.

2. EXERCISE OF YOUR RIGHTS

1. You can exercise your rights by sending a written request by mail, which is dated, signed and attached with a copy of your identity card (only the front) per e-mail to privacy@hamann.be,
Or at the bottom of the e-mails by the 'unsubscribe'-button.
2. You can also submit a complaint at the data protection authority, per post to Drukpersstraat 15, 1000 Brussel,
Or per e-mail to commission@privacycommission.be,
Or per telephone at +32 2 274 48 00.

IX. COOKIES

1. What is a cookie?

A "cookie" is a small text file that is sent from the server of Hamann and is stored on your computer's hard drive. This way we can remember your preferences when visiting our Website. The information stored through these cookies can only be read by Hamann and only for the duration of your visit to the Website.

2. Why do we use cookies?

Our website primarily uses Cookies and similar technologies to enhance the surfing experience on our Website. All data Hamann retrieves from their cookies is only used to distinguish your preferences from those of the other users of our Website. This allows us to offer you a better experience when you visit our Website and to optimize our Website in the meantime.

As a result of recent amendments of the law, all websites focusing on certain parts of the European Union are obligated to ask for your permission in order to use or save cookies and similar technologies on your computer or mobile devices. This policy clearly and completely informs you about the cookies we use and their purpose.

3. Kind of cookies:

Cookies can be subdivided based on their offspring, function and durability.

Our Website only uses the following cookies:

Functionality cookies

Name	Function
Authentication cookies 'Remember me'	Identification of the website user.
User input cookies 'Lifestyle Identifier'	Remembering user actions on website.
User interface customization-cookies	Used to remember the users preferences.

Non-functionality cookies

Name	Function
Trackingcookies	Used to keep track web surfing activity of the user.
Social plug-in trackingcookies	Are used to offer social media modules on a website, such as a Facebook like button, LinkedIn share button or the possibility to retweet a message.

4. For cookies set by third parties (Google Analytics, AdWords...) we kindly refer you to the statements set forth by these parties on their respective websites. Beware, we do not have any influence on the content of these statements nor on the content of the cookies of these third parties:

5. Your permission:

When you first visit our Website, you express your implicit approval to accept our different kinds of cookies.

You can block Cookies by activating your browser settings which allows you to refuse the cookies. The rejection of these cookies may have the effect of not allowing you to use some functionalities on the Website.

X. APPLICABLE LAW AND JURISDICTION

1. Belgian law applies to this privacy statement. Any disputes arising from this or otherwise related to this Website and/or any of the services performed by Hamann will be submitted to the competent court of Ghent.

XI. QUESTIONS OR REQUESTS?

If you have any questions or requests about the privacy policy of Hamann, please contact:

Hamann International Logistics NV

Vantegemstraat 3

B - 9230 Wetteren

Telephone: 09/333 77 77

E-mail: info@hamann.be