

# GENERAL PRIVACY POLICY B.I.G.

Version: 2.0 –JANUARY 2025



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## 1. INTRODUCTION

Beaulieu International Group respects your privacy and is committed to processing your personal data in accordance with the General Data Protection Regulation (“**GDPR**”) and any applicable local laws regulating the processing of personal data.

The controller over your personal data is group headquarters Beaulieu International Group NV, a company incorporated in Belgium, with registered office at Kalkhoevestraat 16 box 0.1, 8790 Waregem, Belgium, and with company registration number 0442.824.497, under certain circumstances together with one or more of its affiliates or subsidiaries (hereinafter together: “**B.I.G**” or “**we**”). You can consult the full list of companies that are part of the Beaulieu International Group in our latest annual report which can be found [here](#). Nevertheless, whichever of our group entities is/are involved in the processing of your personal data in the context of your specific relationship with B.I.G., you can contact our central group Privacy Office for any questions or requests in relation to the processing of your personal data via e-mail at [privacy@bintg.com](mailto:privacy@bintg.com), or by mail to Beaulieu International Group NV, Privacy Office, Kalkhoevestraat 16 box 0.1, 8790 Waregem, Belgium.

This privacy policy (hereinafter: “**Privacy Policy**”) aims to inform you about the processing of your personal data by us in relation to any order or purchase made by you, any of our events or visits to our premises you have participated in, and your visits to and use of our websites and platforms (hereinafter: “**Websites**”), and generally as part of your communication with us via e-mail, telephone, fax and social media (hereinafter: “**Social Media Channels**”; B.I.G. maintains social media pages on Facebook, LinkedIn, Twitter, Pinterest, TikTok, WeChat and Instagram).

In addition to this Privacy Policy, we have specific policies in place for the processing activities listed below. If you are looking for more information about these processing activities, we kindly refer you to these specific policies:

### - **Job applicants:**

This Privacy Policy does not apply to the processing of personal data of individuals who choose to apply for a job with B.I.G. via our jobsite ([www.careers.bintg.com](http://www.careers.bintg.com)), except for what concerns the general processing activities listed under title 3 as these are relevant for all our contacts. Other than that, the processing of personal data of job applicants is governed by a separate privacy policy made available on our jobsite and which can be consulted [here](#).

- **Cookies:**

Our Websites use cookies. We include basic information on our use of cookies in this Privacy Policy. However, if you want detailed information on how we process personal data via cookies, social plugins, pixels and other types of tracking technology, you are kindly referred to the applicable Cookie Policy for the B.I.G. Website you are currently visiting.

## **2. TO WHOM DOES THIS PRIVACY POLICY APPLY?**

In the context of our business activities, we process personal data from the following categories of individuals ("data subjects" under the GDPR). Insofar relevant in light of the specific processing activity, this includes persons who belonged to these categories in the past (e.g. former customer), or persons who may belong to these categories in the future (e.g. potential customer). If any of the persons referred to below is a legal entity, we still process data of our contacts at these entities and the GDPR and this Privacy Policy continue to apply.

- **Customers:** direct customers of B.I.G. and B.I.G.'s contact persons at the customer (if it is a business, which will mostly be the case as B.I.G.'s sales activities are primarily directed at businesses);
- **End-customers:** customers of B.I.G.'s customers and B.I.G.'s contact persons at these end-customers (if it is a business);
- **Vendors:** individuals who enter into a contract with B.I.G. in the name and on behalf of a supplier, service provider, or partner for which they work and the contact persons of such organizations;
- Any other individuals who initiate contact with us or who otherwise express their interest in our products, including visitors of our Websites and individuals who have subscribed via whichever channel to one of our newsletters or other regular communications.

Where relevant, this Privacy Policy will keep referring to and distinguishing between these categories of data subjects.

## **3. FROM WHOM DO WE RECEIVE YOUR PERSONAL DATA?**

We primarily obtain your personal data directly from you, through your contact with us. However, we cannot exclude obtaining some of your data from public sources or third parties in specific circumstances.

This includes for example the receipt of personal data relating to our customers or end-customers, from one of our partners involved in the chain of production, supply and sale of our products (e.g. in the context of a claim filed by you in relation to our products, or in the context of orders placed by end-customers on the retail channels of our partners).

In addition, if you are our contact for a legal entity or otherwise are connected with a legal entity with which we (potentially will) have a business relationship, we may also obtain your relevant data from your colleagues who refer us to you, from publicly accessible sources (e.g. Belgian Official Journal, Belgian Crossroads Bank of Enterprises, other public databases containing company information), or from service providers maintaining private company databases.

## **4. WHICH PERSONAL DATA DO WE PROCESS FROM YOU, FOR WHICH PURPOSES, BASED UPON WHICH LEGAL GROUNDS, AND FOR HOW LONG?**

Below we clarify which personal data we may process from you, under which legal basis we process it, for what purposes, and for which duration. We do not necessarily process all your data listed below. This depends on the specific situation, your specific relationship with B.I.G., your preferences and the means by which we maintain contact. For the sake of clarity, we first indicate below which data we may generally process from all our contacts. Then we will clarify which data we may process additionally from specific categories of contacts, more specifically our customers, end-customers and vendors.

B.I.G. engages in the following processing activities:

## Our general processing activities

| Purpose  | Categories of personal data   | Legal ground   |
|--|---|--|
| <p>Answering your query when you contact us, via the general contact forms on our Websites or via any other means of communication (including via e-mail, telephone or post, via physical events (e.g. building fair)), or via our pages on Social Media Channels which redirect to our Websites.</p>  | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, country</li> <li>- <b>Current employment data:</b> current employer</li> <li>- <b>Contact details:</b> postal address, email address, telephone number, fax number, website address, etc.</li> <li>- <b>Preferences:</b> products/other subjects that interest you</li> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> </ul> | <ul style="list-style-type: none"> <li>- Where your request cannot be framed in the establishment or performance of a contract, we process your data based on our legitimate interest to do so which is our commercial interest as a company to answer your queries in relation to us and/or our products</li> <li>- Necessity for the establishment or performance of a contract</li> </ul> |
| <p>Directing newsletters and other (electronical) marketing communications promoting the products and activities of B.I.G. to individuals who provided us with their consent to do so, via one of the opt-in forms on our Websites, or in any other way (e.g. in the context of B.I.G.'s presence on events). For our marketing activities in relation to our existing customers, please refer to our customer-specific processing activities below.</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> <li>- <b>Current employment data:</b> current employer, title</li> <li>- <b>Contact details:</b> e-mail address</li> <li>- <b>E-mail preferences:</b> products that interest you.</li> </ul>  | <p>Consent</p>   |
| <p>Providing secure and technically sound Websites by using strictly necessary cookies, consisting of:</p> <ul style="list-style-type: none"> <li>- technically essential cookies which are necessary for purely technical reasons to enable communication between the Websites and visitors' devices</li> <li>- functional cookies, which ensure that the basic functionalities of our Websites work properly.</li> </ul>                               | <p><b>Electronic identification and usage data:</b> such as IP address, browser type, location data, via which webpage you arrived at our Website, the type of device you use to visit our Website, the web pages visited, the way you navigate on the web pages visited.</p>   | <p>We process your data based on our legitimate interest to do so, which is our interest in providing secure, functional, and user-friendly Websites providing information on our company and products, to our website visitors</p>  |
| <p>The use of analytical cookies on our Websites to gain insight into how you use our Websites, with a view to enabling improvements including remediating navigation problems, and making our Websites more user-friendly and attractive.</p>   |   | <p>Consent</p>   |
| <p>The use of advertising and social media cookies on B.I.G.'s Websites, for the purposes of displaying advertisements, implementing functions on our Websites provided by social media, and measuring how often these advertisements and</p>  |   | <p>Consent</p>   |

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| <p>functions are respectively displayed and used.</p>  |   |   |
| <p>Fulfilling our legal obligations as a company, such as pursuant to data protection law, corporate law, and tax and accounting law, and complying with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities.</p>  | <p>All personal data mentioned in this Privacy Policy, to the extent necessary with a view to meeting the relevant legal obligation.</p>  | <p>Legal obligation</p>   |
| <p>Ensuring security within and around B.I.G.'s business premises and the effective protection of B.I.G.'s property, its staff, customers and any other visitors through the presence of surveillance cameras in our business premises, for the strict purpose of monitoring and surveilling the security and safety in accordance with the Belgian Camera Act of 21 March 2007 or the other local legislation applicable at the location of our business premises. B.I.G. has installed a pictogram announcing the camera surveillance at the entrance of each monitored place. In case of a judicial investigation or a police request, images may be transferred in accordance with the GDPR, without your prior consent. Such transfer will only take place under the supervision of the judicial and police authorities and camera images will never be transferred for any other (e.g. commercial) purposes.</p> | <p>Surveillance camera footage, as captured by our CCTV systems. The footage may reveal other personal data, including physical appearance and license plate number.</p>  | <p>We process your data based on our legitimate interest to do so which is our interest as a company to protect our and our visitors' property and to ensure the safety and security on our premises and in accordance with applicable camera legislation</p>   |
| <p>The registration of all external visitors to B.I.G.'s premises, for purposes of security (protection of staff and company property) and safety (e.g. in case of an emergency).</p>  | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> <li>- <b>Professional contact details:</b> email address (work), telephone number (work)</li> <li>- <b>Current employment data:</b> current employer, title</li> <li>- Time in and out</li> <li>- Appointment</li> <li>- Visitor agreement</li> </ul> | <p>We process your data based on our legitimate interest to do so which is our interest to log visitors for a limited period of time for security and safety purposes on our premises</p>   |
| <p>The initiation and further management of legal or other proceedings where B.I.G. is compelled to pursue protection/enforcement of its interests via the judicial system or other relevant channels, or vice versa, when legal or other proceedings are initiated by a third party against B.I.G., to organize its defense.</p>  | <p>All personal data mentioned in this Privacy Policy, to the extent relevant to the dispute at hand.</p>   | <p>We process your data based on our legitimate interest to do so which is to ensure the possibility of the establishment and exercise or defense against legal claims or to otherwise enforce our rights in or outside court, if we believe that our interests are being harmed and legal or other proceedings are imminent (e.g., judicial collection of an unpaid invoice), or if legal action</p> |

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|  |  | <p>should be taken against us by a person who feels aggrieved by us (e.g., for organizing our defense against a liability claim for defects in the delivery of our products)</p>  |
| <p>The management and operation of our supporting back-end business functions, including:</p> <ul style="list-style-type: none"> <li>- business continuity management to ensure business continuity in case of disasters, failures or attacks impacting our IT systems;</li> <li>- internal audit activities to monitor internal compliance risks and mitigate those risks;</li> <li>- IT Security logging and risk management, to log security events with a view to responding appropriately to IT related risks.</li> </ul> | <p>All personal data mentioned in this Privacy Policy, to the extent necessary for performing the relevant business function.</p>  | <p>We process your data based on our legitimate interest to do so which is our interest</p> <ul style="list-style-type: none"> <li>- to ensure business continuity in case of disasters, failures or attacks impacting BIG IT systems</li> <li>- to monitor internal compliance risks and mitigate those risks</li> <li>- to log security events with a view to responding appropriately to IT related risks.</li> </ul>  |
| <p>The management of our group-wide whistleblowing reporting channel (<a href="https://bintg.whispli.com/lp/speakup">https://bintg.whispli.com/lp/speakup</a>), via which both internal and external stakeholders can file a report on potential breaches of relevant national and Union laws, and the follow-up on individual reports.</p>  | <p>Reporting person:</p> <ul style="list-style-type: none"> <li>- (Only if the reporting person indicates he/she does not wish to remain anonymous): <b>Personal identification data and communication and identity disclosure preferences:</b> name, location, date of birth, nationality, family details and other identifiable information that allows the individual to be identified, e-mail address, telephone number third-party usernames, residential, business and postal address, and other information that allows the individual to be contacted, preferred means of communication, permission to share identity also with the B.I.G. entity related to a concern</li> <li>- <b>Incident details:</b> location, date, relationship of reporting person to company, incident description, supporting documents, reporting to management status</li> <li>- Company registration number (if relevant)</li> </ul> | <ul style="list-style-type: none"> <li>- Legal obligation including the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, and the laws transposing this Directive into national law</li> <li>- Explicit consent (in two steps: to disclose the identity of the reporting person to 1) our designated internal whistleblowing team, and 2) the B.I.G. entity related to a report)</li> <li>- Processing is necessary for reasons of substantial public interest (article 9(2)(g) GDPR, insofar special categories of personal data are included in a report and/or article 10, §1, °3 of the Belgian law of 30 July 2018 insofar any criminal data is included in a report).</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> </ul> <p>Target of a report:</p> <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, job title or function</li> <li>- Company registration number (if relevant)</li> <li>- All other personal data on this individual included in the report filed by the reporting person, which may include special categories of personal data, and criminal data</li> </ul> <p>Personal data may also be processed from individuals protected as a person connected with or assisting the reporting person under the Whistleblowers Act (e.g. facilitators, third parties connected to the reporting person such as colleagues or family members of the reporting person), and of any other individuals mentioned in a report.</p> |  |
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- Customers

| Purpose   | Categories of personal data  | Legal ground  |
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| <p>Managing our direct customer relations, which encompasses the full cycle of the business relationship with customers from the internal creation process of new customers and the negotiation and conclusion of the relevant customer contracts, to the management of the contractual relationship including presenting offers, processing purchase orders, shipping the products and addressing invoices, fulfilling aftersales obligations, to the termination of the agreement, and any communication taking place between B.I.G. and the (contact persons at) the customer in this context, and any related internal administration requests.</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, signature</li> <li>- <b>Current employment data:</b> current employer, job title (if B2B)</li> <li>- <b>Contact details:</b> postal address, email address, telephone number</li> <li>- <b>Account registration and contractual information:</b> e.g. company name, legal form, company registration number, VAT number, company registered address (if B2B), delivery address, invoice address, language, purchase orders and order confirmations, delivery notes, contracts, etc.</li> <li>- <b>Financial identification data:</b> bank account</li> </ul> | <ul style="list-style-type: none"> <li>- Necessity for the establishment or performance of a contract</li> <li>- Legal obligation, for the processing necessary to fulfill the accounting obligations to which B.I.G. is subject under tax and accounting laws as an enterprise, and product conformity and warranty obligations to which B.I.G. is subject as a manufacturer/seller of goods.</li> </ul> |

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|  | <p>number, means of payment.</p> <ul style="list-style-type: none"> <li>- <b>Payment details:</b> invoice and invoicing preferences, amount, balance due, start date, duration, interest rate, payment statement, payment conditions, payment history, etc.</li> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> </ul>   |   |
| <p>Provisioning B2B customers, where appropriate in light of the nature of the customer relationship and the scale and frequency of our transactions, with access to our e-commerce portal for the purpose of easy management of the customer relationship and the secure transmission and storage of the data relevant to it, such as by allowing customers to place orders, consulting and downloading documents created in the context of the customer relationship, and consulting and downloading technical product information.</p>  | <ul style="list-style-type: none"> <li>- <b>Electronic identification data (see strictly necessary cookies under general processing activities)</b></li> <li>- Platform login and password</li> <li>- <b>Personal identification data:</b> name, signature</li> <li>- <b>Current employment data:</b> current employer, job title</li> <li>- <b>Professional contact details:</b> postal address (work), email address (work), telephone number (work)</li> <li>- <b>Account registration and contractual information (see first row)</b></li> <li>- <b>Financial identification data (see first row)</b></li> <li>- <b>Payment details (see first row)</b></li> <li>- <b>Communications data (see first row)</b></li> </ul> | <ul style="list-style-type: none"> <li>- Performance of a contract</li> </ul>   |
| <p>Handling claims relating to goods manufactured / supplied by B.I.G. In this context, a form has to be filled in by the customer, end-customer and/or installer. This contains optional fields which allow us to collect additional information for the proper investigation of a claim. In case of doubts, an on-site inspection can be performed of the goods to which the claim relates whereby pictures can be taken as evidence, in order to make an informed decision on the claim. A file is maintained on every claim received, containing the complaint and the supporting evidence, any solutions or compensations proposed or provided in this regard, and any communication that took place in the context of the claim.</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> <li>- <b>Account registration and contractual information:</b> company registered address (if B2B), date and number of invoice, delivery or order</li> <li>- <b>Contact details:</b> postal address, e-mail address, telephone number</li> <li>- <b>Technical details of the claim:</b> date of claim, date of installation, date of problem, date of inspection (if performed), claim number, building type and room parameters, installation parameters, product parameters and</li> </ul>   | <ul style="list-style-type: none"> <li>- Performance of a contract</li> <li>- Legal obligation, for the processing necessary to fulfill product conformity and warranty obligations to which B.I.G. is subject as a manufacturer/seller of goods</li> <li>- for optional information fields in the claims form and on-site inspections (if warranted), we process your data based on our legitimate interest which is to collect additional evidence for the investigation of a claim and to carry out an inspection to make an informed decision on the claim</li> </ul> |

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|   | <p>identification numbers, purchase amounts and dates, problem description, expected solution/compensation, comments, attachments.</p> <ul style="list-style-type: none"> <li>- <b>Pictures</b></li> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> </ul> |  |
| <p>Prior screening of all third parties B.I.G. wishes to conduct business with and ongoing screening of third parties B.I.G. is currently doing business with, including B2B customers, against economic and other relevant sanction lists (e.g. issued by OFAC), to screen business partners against official sanction lists prior to and while doing business with them, to effectively identify and manage compliance and reputation risks. While the data processed mainly relates to legal persons and not specific individuals within or related to them, in the screening process also personal data may be processed of representatives, UBOs and other persons connected with potential new and current customers.</p>       | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, country</li> <li>- <b>Financial identification data:</b> shareholder / UBO status and ownership amounts</li> <li>- <b>Current employment data:</b> current employer, title</li> </ul>                                  | <ul style="list-style-type: none"> <li>- We process your data based on our legitimate interest which is the effective identification and management of compliance and reputation risks for our company by the prior screening of business partners against official sanction lists</li> <li>- Legal obligation, where the processing is necessary to comply with any binding economic or other sanctions at the national or EU level.</li> </ul> |
| <p>Inviting B2B customers via e-mail to provide a Net Promoter Score (NPS) regarding their satisfaction about B.I.G.'s goods and services, in order to be able to evaluate customer satisfaction. The results of the NPS satisfaction surveys are only retained at aggregated, and not at individual level.</p>   | <ul style="list-style-type: none"> <li>- <b>Professional contact details:</b> e-mail address</li> <li>- <b>Electronic identification data:</b> personal URL link</li> <li>- Net Promotor Score</li> </ul>  | <ul style="list-style-type: none"> <li>- We process your data based on our legitimate interest which is to evaluate customer satisfaction</li> </ul>   |
| <p>Via the Floorfit functionality on the <a href="#">BerryAlloc samples webshop</a>, (potential) customers can upload a photo of their room and visualize different floors offered by our BerryAlloc division in this photo. This helps them find a floor that fits their room and home. The visualization tool is powered by Roomvo (operated by Leap Tools). While it is not B.I.G.'s intention to capture any personal data via the room visualization functionality, and the uploaded photos are not stored by B.I.G. after the use of the tool, it cannot be excluded that uploaded photos contain personal data and that personal data is processed for a very limited period during the use of the Floorfit functionality.</p> | <ul style="list-style-type: none"> <li>- <b>Electronic identification data (see cookies under general processing activities)</b></li> <li>- <b>Pictures</b></li> </ul>   | <ul style="list-style-type: none"> <li>- Consent</li> </ul>  |
| <p>Promoting B.I.G.'s products and activities, by using your contact details to send</p>  | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> </ul>  | <ul style="list-style-type: none"> <li>- Where permitted by law, we process your data based on our legitimate</li> </ul>   |



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| <p>marketing material to you, via e-mail or other channels, in the context of our existing customer relationship and tailored to the specific circumstances thereof.</p>  | <ul style="list-style-type: none"> <li>- <b>Current employment data:</b> current employer, title</li> <li>- <b>Contact details:</b> e-mail address, postal address</li> <li>- <b>Account registration and contractual information:</b> purchase history</li> <li>- <b>E-mail preferences:</b> products that interest you.</li> </ul>   | <p>interest which is to inform you, as our recent customer, of our products and activities that may be of interest to you in light of your previous purchases</p> <ul style="list-style-type: none"> <li>- Consent if expressly requested by you (e.g. via our Websites, see under general processing activities)</li> </ul>  |
| <p>Inviting existing B2B customers to join events we organize or participate in, and registering attendance and preferences, if relevant.</p> <p>On such events, and subject to your consent, photos or videos may be taken/recorded and used for publication in physical promotional material or on the Websites and other online channels on which B.I.G. is present (including Social Media Channels).</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> <li>- <b>Current employment data:</b> current employer, title</li> <li>- <b>Professional contact details:</b> postal address (work), email address (work), telephone number (work)</li> <li>- <b>Event related information:</b> registration, preferences</li> <li>- <b>Communications data:</b> communications received and sent, communication history</li> <li>- <b>Pictures:</b> photo and video.</li> </ul> | <ul style="list-style-type: none"> <li>- We process your data based on our legitimate interest which is to further build our relationship with you as recent customer by inviting you to events that may be of interest to you in light of your previous purchases (invitation)</li> <li>- Performance of a contract or consent, as appropriate and communicated to you in function of the specific event (registration)</li> <li>- Consent (taking and use of pictures)</li> </ul> |
| <p>In case of non-paying B2B customers, taking the necessary steps with a view to obtaining compensation / payment.</p>   | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, telephone number, e-mail address</li> <li>- <b>Communications data:</b> communications received and sent, communication history</li> <li>- <b>Payment details:</b> invoice, amount, balance due</li> </ul>   | <ul style="list-style-type: none"> <li>- We process your data based on our legitimate interest which is our commercial and financial interest in obtaining payment for products we supplied</li> </ul>  |

- **End-customers**

| Purpose  | Categories of personal data   | Legal ground   |
|--|---|--|
| <p>Processing and fulfilling orders which are placed by the end-customer on the retail channels of our partners (including DIY retailers). Our partner, selling the goods to you via its own retail channel (e.g. webshop), will provide us with your relevant data to ship your goods and take care of our related internal administration. Our partner, as seller, will remain your primary point of contact for sales and aftersales queries. In normal circumstances, we will only have contact for scheduling the delivery.</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, signature, postal address, telephone number (for making a shipping appointment)</li> <li>- <b>Contractual information:</b> purchase orders, delivery notes</li> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> </ul> | <ul style="list-style-type: none"> <li>- Performance of a contract</li> <li>- Legal obligation, for the processing necessary to fulfill the accounting obligations to which B.I.G. is subject under tax and accounting laws as an enterprise, and product conformity and warranty obligations to which B.I.G. is subject as a manufacturer/seller of goods.</li> </ul> |
| <p>Handling claims relating to goods manufactured / supplied by B.I.G. In this context, a form has to be filled in by the customer, end-customer and/or installer. This contains optional fields which allow us to collect additional information for the proper investigation of a claim. In case of doubts, an on-site inspection can be performed of the goods to which the claim</p>   | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> <li>- <b>Account registration and contractual information:</b> company registered address (if B2B), date and number of invoice, delivery or order</li> </ul>  | <ul style="list-style-type: none"> <li>- Performance of a contract</li> <li>- Legal obligation, for the processing necessary to fulfill product conformity and warranty obligations to which B.I.G. is subject as a manufacturer/seller of goods.</li> </ul>   |

relates whereby pictures can be taken as evidence, in order to make an informed decision on the claim. A file is maintained on every claim received, containing the complaint and the supporting evidence, any solutions or compensations proposed or provided in this regard, and any communication that took place in the context of the claim.

- **Contact details:** postal address, e-mail address, telephone number
- **Technical details of the claim:** date of claim, date of installation, date of problem, date of inspection (if performed), claim number, building type and room parameters, installation parameters, product parameters and identification numbers, purchase amounts and dates, problem description, expected solution/compensation, comments, attachments.
- **Pictures**
- **Communications data:** communications received and sent, communication history.

- For optional information fields in the claims form, and on-site inspections (if warranted), we process your data based on our legitimate interest which is to collect additional evidence for the investigation of a claim and to carry out an inspection to make an informed decision on the claim

- **Vendors**

| Purpose  | Categories of personal data   | Legal ground   |
|--|---|--|
| <p>Managing our vendor database and supply chain, which encompasses the full cycle of the business relationship with vendors from the internal creation process of new vendors and the negotiation and conclusion of the relevant vendor contracts, to the management of the contractual relationship including processing purchase orders and handling incoming invoices, to the termination of the agreement, and any communication taking place between B.I.G. and the (contact persons at) the vendor in this context, and any related internal administration requests.</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, signature</li> <li>- <b>Current employment data:</b> current employer, job title</li> <li>- <b>Professional contact details:</b> postal address (work), email address (work), telephone number (work)</li> <li>- <b>Financial identification data:</b> bank account number, means of payment.</li> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> <li>- <b>Account registration and contractual information:</b> e.g. company name, legal form, company registration number, VAT number, company registered address, language, order confirmations, contracts, etc.</li> </ul> | <ul style="list-style-type: none"> <li>- Necessity for the establishment or performance of a contract</li> </ul> |

|   |  |  |
|---|--|--|
| <p>If a vendor designates one or more of his staff members to work on projects for B.I.G., and if warranted in light of the nature and scale of the services, keeping track of and internally approving the hours performed by the vendor's staff members, via an internal time registration tool, and carrying out invoice matching (verifying whether the amounts invoiced for the services by the vendor under which the individual works are consistent with the hours performed and registered by him/her).</p>  | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name</li> <li>- <b>Current employment data:</b> current employer, title and job description, employee ID number (if vendor works on B.I.G.'s systems)</li> <li>- <b>Payment details:</b> invoice</li> <li>- <b>Work organization:</b> current responsibilities, ongoing projects, hourly rate, hours worked.</li> </ul>  | <ul style="list-style-type: none"> <li>- We process your data based on our legitimate interest which is our financial interest in registering time performed by relevant vendors' staff to ensure correct and consistent invoicing by the vendor</li> </ul>  |
| <p>Prior screening of all third parties B.I.G. wishes to conduct business with and ongoing screening of third parties B.I.G. is currently doing business with, including vendors, against economic and other relevant sanction lists (e.g. issued by OFAC), and the carrying out of third-party risk assessments in relation to vendors, based upon risk domains (human rights, Anti-Bribery and Anti-Corruption, environmental) and other relevant parameters, to screen business partners against official sanction lists prior to and while doing business with them, and generally to effectively identify and manage compliance and reputation risks. While the data processed mainly relates to legal persons and not specific individuals within or related to them, in the screening process also personal data may be processed of representatives, UBOs and other persons connected with potential new and current vendors.</p> | <ul style="list-style-type: none"> <li>- <b>Personal identification data:</b> name, country</li> <li>- <b>Financial identification data:</b> shareholder / UBO status and ownership amounts</li> <li>- <b>Account registration and contractual information:</b> company name, legal form, company registration number, VAT number, company registered address</li> <li>- <b>Professional contact details:</b> postal address (work), email address (work), telephone number (work)</li> <li>- <b>Current employment data:</b> current employer, title</li> <li>- <b>Communications data:</b> communications received and sent, communication history.</li> <li>- <b>Electronic identification data (see strictly necessary cookies under general processing activities)</b></li> </ul> | <ul style="list-style-type: none"> <li>- We process your data based on our legitimate interest which is the effective identification and management of compliance and reputation risks for our company by the prior screening of business partners against official sanction lists, and from the perspective of risk domains we consider important in light of our values as a company</li> <li>- Legal obligation, where the processing is necessary to comply with any binding economic or other sanctions at the national or EU level.</li> </ul> |

## 5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

B.I.G. is a company group (see under title 1) under which various companies and commercial activities are housed. We may share your personal data with other entities and business units within our group for administrative and infrastructure-related reasons, as well as for commercial reasons such as, in particular, ensuring an optimal service under involvement of our relevant local branches. We will ensure that all B.I.G. group entities will take due care that all processing of your personal data is in line with what is set out in this Privacy Policy. In addition, due to our centralized approach on data management, a customer or vendor of one of our companies is considered a customer or vendor of the entire group. As a data subject, it is of course possible to oppose the transfer and where relevant, the further use of your personal data for commercial purposes under the conditions of the GDPR, by contacting us to exercise your rights as a data subject as explained in more detail under Title 7.

In addition, we may - under certain conditions - transfer your personal data outside of our company group, to third parties. This is particularly the case if this is strictly necessary in view of the purposes listed under title 3, or if we are legally obliged to do so.

Certain of these third parties work on our behalf and/or have been engaged by us with a view to outsourcing an element of our business operations and services to them. This includes for example the digital storage of our customer and vendor data, the management of our Websites, the provisioning of IT applications, the shipping of our products to our customers, or for dispute management. To the extent

these third parties act as B.I.G.'s processors within the meaning of the GDPR, B.I.G. will enter into a data processing agreement prior to entrusting any personal data to them. B.I.G. will only share personal data relevant and necessary for the performance of the specific tasks of each processor. The confidential handling of your personal data and their adequate security is always included as a requirement in every data processing agreement.

Transfers of personal data to third parties generally take place within the context of our efforts to ensure the best possible service and efficient business operations, as well as to safeguard our interests and to comply with our legal obligations. B.I.G. warrants that it will limit the disclosure to the personal data that is strictly necessary to fulfill the purposes listed in article 3 above.

Please find herewith an overview of the categories of recipients whom we may share your relevant personal data with:

- Postal companies, transporters, and couriers if we need to transport our goods to you or send you written communications or other items. Our main shipping partners include Manuport Logistics, Tailormade Logistics, and Verhoek Europe;
- Payment service providers if we receive payments from you, or make payments to you. On our own webshops, we implement the payment modules offered by Mollie;
- Insurers for the purpose of covering our professional liability in the context of our business operations and the offer and delivery of our goods and services, and for covering the credit risk in the context of our sales activities;
- Our vendors, including external representatives, consultants or any other business partners who are involved in the context of operating our businesses and providing our goods. If you are a customer or end-customer, your personal data may be transferred insofar necessary to (or received from) other parties involved in the chain of production, supply and sale of our products (e.g. operators of sales channels on which B.I.G. products are sold by our customers to end-customers, distributors, agents, dealers, installers);
- Our vendors who assist us in the promotion of our products and the organization of events (e.g. event planners, marketing agencies, photographers);
- Processors who assist us in the technical or IT field with the operation of our businesses, for the purpose of a secure and efficient digital data management within our businesses and optimal service delivery, such as software service providers, hosting providers, website and data center managers, and providers of back-up services. Our main software providers include Microsoft, Salesforce, IBM, Hubspot, Leap Tools, E2Open, Aravo Solutions, and Fraudsec Pty Ltd.
- When you visit the pages B.I.G. has on its different Social Media Channels, your data will be transmitted to the operators of these respective Social Media Channels through the use of cookies. These Social Media Channels may receive personal data about you such as for example your IP address or the websites you have previously visited. When you visit our social media pages B.I.G. may also receive aggregated data from these Social Media Channels in the form of statistics on how our pages are viewed by visitors hereof. For information on the social media related cookies we use on our own Websites, please refer to the applicable Cookie Policy for the B.I.G. Website you are currently visiting. For more information on the scope, purposes and processing of your personal data by these Social Media Channels, we kindly refer to the privacy policies of the respective Social Media Channels themselves;
- Organisations we enter into a business transaction with, and that results in the inclusion of additional entities in our group (e.g. as part of a merger), or that results in the transfer of certain of our entities or business assets to an acquirer. If this proves to be necessary, we will take the necessary precautions (e.g. need-to-know-basis only, enter into confidentiality agreements and apply other industry best practices) to protect your privacy at all times in the context of such transaction;
- Government bodies, law enforcement, judicial authorities, practitioners of regulated professions such as accountants, auditors and lawyers, or other independent external advisors, and collection agencies, for the purpose of complying with our legal obligations and insofar necessary for the establishment, exercise or defense of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions.

## 6. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

The European Economic Area ("EEA") includes the countries of the European Union (EU), Norway, Liechtenstein, and Iceland. The GDPR requires adequate safeguards if your personal data is transferred to entities in countries outside the EEA (such as entering into agreements based on the European Commission's Standard Contractual Clauses).

As a company group, we have our headquarters in Belgium and we also aim to keep your data on servers and in data centers within the EEA as much as possible. However, in light of the structure of our company group (see under title 1), intra-group transfers to B.I.G. entities based in countries outside the EEA may take place, for example when you wish to order specific goods from such entities. For these purposes, the B.I.G. entities have concluded an intra-group data transfer agreement, based upon the Standard Contractual Clauses made available by the European Commission.

Secondly, given the location of certain of our service providers, it is possible that in certain cases, and depending on your specific relationship with us, your data may be processed outside the EEA. We will only transfer your personal data to service providers based or operating in countries that have been confirmed by the European Commission to ensure an adequate level of protection of your data, or where other measures are in place to ensure the lawful processing of your data in these third countries in accordance with the requirements of the GDPR mentioned above. Our service providers in third countries and the adequacy decision or appropriate safeguards upon which each transfer is based, include:

- Microsoft (United States), based upon the [inclusion of Microsoft Corporation on the EU-US Data Privacy Framework List](#);
- Salesforce (United States), based upon the [inclusion of Salesforce on the EU-US Data Privacy Framework List](#);
- Leap Tools HQ (Canada), based upon [Commission Decision of 20 December 2001](#) pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data provided by the Canadian Personal Information Protection and Electronic Documents Act;
- HubSpot (United States), based upon the [inclusion of HubSpot Inc. on the EU-US Data Privacy Framework List](#);
- e2open (United States) and onward transfers, based upon the inclusion of Standard Contractual Clauses in our data processing agreement with e2open;
- Meta Platforms (United States), based upon the [inclusion of Meta Platforms on the EU-US Data Privacy Framework List](#);
- LinkedIn (United States), based upon the [inclusion of LinkedIn on the EU-US Data Privacy Framework List](#);
- Aravo Solutions (United States), based upon the inclusion of Standard Contractual Clauses in our data processing agreement with Aravo Solutions;

## 7. HOW DO WE SECURE YOUR PERSONAL DATA?

B.I.G. applies appropriate technical, physical, and organizational measures that are reasonably designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful forms of processing. Access to personal data is restricted to authorized recipients on a need-to-know basis and subject to strict confidentiality obligations. We maintain a comprehensive information security program that is proportionate to the risks associated with the processing. The program is continuously adapted to mitigate operational risks and to protect personal data, taking into account industry-accepted practices.

## 8. WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

You may wish to exercise a right to obtain information about yourself or to correct, update or delete your personal data. Some of these rights may be subject to some exceptions or limitations in GDPR and/or local law. We will take reasonable steps to verify your identity and we will respond to your request to exercise these rights without undue delay (and in all cases within 1 month of receiving a request, which can be extended to 3 months only under the conditions provided by data protection laws). Below you can find a list of the data protection rights you are entitled to exercise. If you wish to exercise any of the

rights mentioned below, please send your request to our Privacy Office via [privacy@bintg.com](mailto:privacy@bintg.com), or by mail to Beaulieu International Group NV, Privacy Office, Kalkhoevestraat 16 box 0.1, 8790 Waregem, Belgium.

- You have the right to **request access** to all personal data processed by B.I.G. pertaining to you. This allows you to check what personal data we process about you and to get a copy of it, and to obtain additional information on the processing;
- You always have a right to **rectify** your personal data. This allows you to correct or complete incorrect or incomplete personal data that we process about you;
- To the extent the lawful basis we rely upon for processing your personal data is consent, you have the right to **withdraw** your earlier given **consent** for processing your personal data. This will of course not affect the lawfulness of the processing based on consent before its withdrawal;
- You have a right to **erasure** of your personal data. This allows you to permanently delete personal data that we process about you. We are not always obliged to delete your personal data at your request – this right only applies in the cases and to the extent provided for by law;
- You have a right to **restrict** the processing of personal data relating to you. This allows you to freeze the use of your personal data by us, without deleting it. We are not always obliged to restrict your personal data at your request – this right only applies in the cases and to the extent provided for by law;
- You have the right to **object** to the processing of your personal data that is based on our or third parties' legitimate interests. This allows you to oppose the further processing of your personal data. We are not always obliged to honor your objection, in particular when we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

You have the right to specifically **object** to the processing of your personal data for direct marketing purposes (e.g. via clicking on the unsubscribe button), which we are always obliged to honor;

- You have the **right to data portability** in case the lawful basis for the processing of your personal data is consent or the performance of a contract. In such case we will provide you or another controller of your choosing with the personal data you have provided to us in a structured, commonly used and machine-readable format.

In addition to your data subject rights mentioned above, you also have the right to lodge a complaint with your data protection supervisory authority. You can lodge a complaint with the supervisory authority of the EEA member state where you usually reside, where you have your place of work or where the alleged infringement has taken place. As B.I.G.'s headquarters is based in Belgium, please find hereunder the contact details of the Belgian Data Protection Authority:

### **Belgian Data Protection Authority**

Rue de la Presse 35 – Drukpersstraat 35

1000 Bruxelles – Brussel – Brussels

Belgium

Tel. +32 2 274 48 00

Fax +32 2 274 48 35

E-mail: [GBA/APD](mailto:GBA/APD)

Website: <https://www.autoriteprotectiondonnees.be>, <https://www.gegevensbeschermingsautoriteit.be>

For further information and the contact details of the supervisory authority of each EEA member state, please refer to [this website page of the European Data Protection Board](#) with all relevant contact details. In addition, you may always file a claim with the competent civil court for compensation.

## **9. DATA RETENTION PERIOD**

We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the relevant purpose as foreseen in article 4; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the aforementioned purposes or services provided.

## **10. CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time. In circumstances where a change will substantially change the way in which we collect or use your personal data, we will send a notice of this change to all impacted individuals. We will always post the updated version on our Websites, including the version number and date of this last update.