

**PRIVACY STATEMENT NOORDVLEES NV**

*Version Privacy Statement: September 2020*

Noordvlees Van Gool NV (hereinafter referred to as "NOORDVLEES", "we" or "us") attaches great importance to the protection of personal data. As such, your privacy is extremely important for us.

This privacy statement (hereinafter referred to as "Privacy Statement") applies, among other things:

- (i) to our website [noordvlees-group.be](http://noordvlees-group.be) (hereinafter referred to as the "Website")
- (ii) to our webshop [vleeshal-van-gool.be](http://vleeshal-van-gool.be) (hereinafter referred to as the "Webshop");
- (iii) to all (commercial) relationships between NOORDVLEES and customers, prospects, merchants/suppliers, farmers and other business partners; and,
- (iv) to visits to the buildings/branches of NOORDVLEES;

This Privacy Statement includes information about the personal data collected by NOORDVLEES, as well as the manner in which NOORDVLEES uses and processes this personal data for certain purposes.

NOORDVLEES wishes to emphasize that it endeavours at all times to act in accordance with the "Privacy Legislation":

- (i) the Belgian Privacy Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data;
- (ii) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; and/or,
- (iii) any (future) Belgian legislation concerning the implementation of the aforementioned Regulation or any other legislative act amending it.

Visiting the Website and/or Webshop, creating an account on the Webshop, purchasing products, any communication with NOORDVLEES, and visiting the buildings/branches implies your explicit approval (by communicating your personal data or opt-in) of the Privacy Statement and thus of the way NOORDVLEES collects, uses and processes your personal data.

Please read this Privacy Statement in conjunction with the cookie policies of the Website and the Webshop of NOORDVLEES.

**I. Types of personal data**

NOORDVLEES may collect and process the following personal data:

**Standard data**

- ✓ Name
- ✓ First Name
- ✓ Email address
- ✓ Telephone number (landline and/or mobile phone)
- ✓ Fax number
- ✓ Address
- ✓ Standard data

**Core business - customer relations**

- ✓ Company name
- ✓ Unique customer number
- ✓ Abbreviated customer number
- ✓ VAT number
- ✓ Signature
- ✓ Number plate
- ✓ National registration number

**Website/Webshop**

- ✓ Standard data
- ✓ Social media data
- ✓ Gender
- ✓ Information regarding the use of the Websites/Webshop (such as IP address)

**Security**

- ✓ Standard data
- ✓ Camera images

**Transport**

- ✓ Standard data
- ✓ Geographical location data

**General**

- ✓ All personal data contained in the free field of the contact form on the Website Noordvlees-group.be
- ✓ All other personal data voluntarily communicated to NOORDVLEES

**II. Methods of personal data collection**

These personal data are collected in the context of:

**Prospection**

- ✓ The exchange of business cards
- ✓ Requesting a quote

**Relationships with customers - suppliers - other business partners**

- ✓ Incoming and outgoing correspondence with NOORDVLEES
- ✓ A collaboration with NOORDVLEES (e.g. sales of pigs to NOORDVLEES, purchases of pork from NOORDVLEES)
- ✓ Processing FCI (food chain information)
- ✓ Copying the identity cards of drivers delivering live pigs
- ✓ Registering for NOORDVLEES events

**The Website/Webshop**

- ✓ Visiting the Website and/or Webshop
- ✓ Creating an account on the Webshop
- ✓ Filling out a contact form on the Website

**Security of branches/buildings**

- ✓ Collecting images (camera surveillance)
- ✓ Visits to the buildings/branches of NOORDVLEES

The personal data collected by NOORDVLEES are thus expressly and voluntarily provided by you.

The provision of certain personal data is (sometimes) a condition for enjoying certain services (e.g. to purchase products on the Webshop or to participate in certain activities and events). It is indicated which data are mandatory and which are optional in this regard.

**III. Use of personal data**

NOORDVLEES may use your personal data for the following purposes:

**Prospection**

- ✓ Follow-up after a meeting
- ✓ Drawing up a quote

**Compliance**

- ✓ Compliance with legal obligations (e.g. monitoring food safety and protecting animal welfare, combating fraud)
- ✓ Compliance with the requirements for the permits with which NOORDVLEES complies (Beter Leven, Certus, etc.)

**Relationships with customers - suppliers - other business partners**

- ✓ Implementation of an agreement with NOORDVLEES (including follow-up)
- ✓ Providing support/assistance
- ✓ Sending newsletters
- ✓ Document management (e.g. preparation of a commercial file)
- ✓ Participating in events organised by NOORDVLEES
- ✓ Issuing invoices and collecting payment
- ✓ Sending Christmas card/Birthday cards

**Visitors (website or physical)**

- ✓ Answering questions (whether or not asked via contact form)
- ✓ Registration of visitors to the buildings/branches  
Security of the buildings/branches of NOORDVLEES

The processing is done on the following legal grounds, as the case may be:

- ✓ You have given consent for the processing of your personal data for one or more specific purposes
- ✓ The processing is necessary for the performance of the agreement with NOORDVLEES or to take action at your request prior to the conclusion of an agreement
- ✓ The processing is necessary in order to comply with a legal obligation incumbent on NOORDVLEES (e.g. regarding food safety or animal welfare)
- ✓ The processing is necessary in order to protect your vital interests or those of another natural person
- ✓ The processing is necessary for the performance of a task in the public interest
- ✓ The processing is necessary to protect the legitimate interests of NOORDVLEES. Processing on the legal grounds hereunder shall take place in the event of:
  - (i) Security of the buildings/branches of NOORDVLEES; and,
  - (ii) Sending newsletters.

NOORDVLEES always respects the balance between its legitimate interest and your fundamental rights and freedoms by limiting the impact in the following ways:

- (i) by securing and limiting access to the camera images (and other personal data collected for security purposes) as much as possible so that only those persons for whom access to the images/personal data is strictly necessary for the performance of their duties are granted access to the images;

- (ii) by limiting the retention period of the camera images to a maximum of 4 weeks (this is the period necessary to comply with various permits such as 'Beter Leven');
- (iii) by notifying the camera to the police via the website [www.aangiftecamera.be](http://www.aangiftecamera.be);
- (iv) using pictograms to inform the data subject that a certain area is under camera surveillance; and,
- (v) always providing the option for the data subject to unsubscribe from newsletters and subsequently respect this request of the data subject.

We endeavour to limit the impact of processing personal data at all times and will no longer process your data for the above purposes if your personal interests or fundamental rights and freedoms take precedence over our purposes (in accordance with recital 47 of the GDPR).

#### **IV. Disclosure of personal data to third parties**

NOORDVLEES will not disclose your personal data to third parties, unless this is necessary for the execution of the previously described purposes (cfr. III). In this context, your personal data may be disclosed to payment providers, external IT consultants, cloud partners, software providers, transport partners and other service providers (such as document managers).

Noordvlees and Bens NV (registered office in Belgium, BE-2260 Oevel (Westerlo), Nijverheidsstraat 24, BTW BE-0404.141.788, Registry of Legal Persons Antwerp, subsection Turnhout) transfer both personal data to their joint venture slaughterhouse Sus Campiniae NV (registered office in Belgium, BE-2260 Oevel (Westerlo), Nijverheidsstraat 24, BTW BE-0633.945.082, Registry of Legal Persons Antwerp, subsection Turnhout). Given that Noordvlees and Bens process personal data on the IT systems of Sus Campiniae, Noordvlees and Bens are regarded as joint controllers of the personal data that both controllers house in Sus Campiniae. Noordvlees and Bens have therefore entered into a (joint) controller agreement in which both parties have given the necessary commitments regarding the data processing via Sus Campiniae.

The processing of personal data by processors is governed by a data processing agreement which obliges the processor to treat or process your personal data in at least as restrictive a manner as NOORDVLEES itself and which lays down (i) the duration of the processing, (ii) the nature and purpose of the processing, (iii) the type of personal data and (iv) the categories of data subjects and (v) the obligations and rights of the third party and NOORDVLEES.

Notwithstanding the foregoing, it is however possible that NOORDVLEES discloses your personal data:

- ✓ To the competent authorities (i) if NOORDVLEES is obliged to do so under the law (i.e. in the context of food safety or animal welfare) or under legal or future legal proceedings and (ii) to safeguard and defend the rights of NOORDVLEES.
- ✓ If NOORDVLEES, or the majority of its assets, are taken over by a third party, in which case your personal data – which NOORDVLEES has collected – shall be one of the transferred assets.

In all other cases, NOORDVLEES will not sell, hire out or pass on your personal data to third parties, except when it (i) has obtained your permission to this end and (ii) has concluded a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy-compliant handling of your personal data.

#### **V. Cross-border processing of personal data**

Any transfer of personal data outside the European Economic Area (EEA) to an addressee residing or domiciled in a country not covered by an adequacy decision issued by the European Commission will be governed by one or more appropriate safeguards (as approved by the EU):

- ✓ The conclusion of a data transfer agreement with the addressee, which will contain the standard contractual clauses as stipulated in the 'Commission Decision of 5 February 2010 (Decision 2010/87/EC)'; and/or
- ✓ Binding corporate rules; and/or
- ✓ Certification mechanism (such as but not limited to the EU-US Privacy Shield).

## VI. Storage of personal data

Unless a longer retention period is required or justified **(i)** by the law or **(ii)** through compliance with another regulation, NOORDVLEES shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in this Privacy Statement under 'III. Use of personal data'.

## VII. Your privacy rights

In the context of the processing of your personal data, you have the following privacy rights:

- ✓ The right to withdraw your consent to the processing of personal data;
- ✓ Right to inspect your personal data;
- ✓ Right to rectification, completion or update of your personal data;
- ✓ Right to delete your personal data ('right to be forgotten');
- ✓ Right to limit the processing of your personal data;
- ✓ Right to transferability of your personal data;
- ✓ Right to object to/oppose the processing of your personal data; and,
- ✓ Right to lodge a complaint with the Data Protection Authority.

If you wish to exercise your privacy rights, please contact [GDPR@noordvlees.be](mailto:GDPR@noordvlees.be) or [fill in the form to exercise your privacy rights](#) and send it to NOORDVLEES via e-mail or post.

In principle, you can exercise these rights free of charge via (i) the above form or (ii) by sending an e-mail to [GDPR@noordvlees.be](mailto:GDPR@noordvlees.be). Moreover, through your account you can always verify, update and/or change the personal data you were required to provide when creating your account.

If you no longer wish to receive newsletters from NOORDVLEES, you can unsubscribe at any time by replying to the e-mail in which the newsletter is contained and thereby letting us know that you no longer wish to receive the newsletter.

## VIII. Security of personal data

NOORDVLEES undertakes to take suitable and reasonable, physical, technological and organizational security measures in order to avoid **(i)** unauthorised or unlawful access to your personal information, and **(ii)** loss, abuse or alteration of your personal data.

In concrete terms, NOORDVLEES has taken the following measures, among others:

- ✓ All persons who may access your data on behalf of NOORDVLEES are bound to secrecy;
- ✓ In the event that NOORDVLEES relies on processors of personal data, the necessary data processing agreement has been concluded, which includes the necessary guarantees regarding confidentiality and privacy-compliant handling of your personal data;
- ✓ We have a username and password policy on all our systems;

- ✓ We make back-up copies of the personal data in order to be able to recover them in the event of physical or technical incidents;
- ✓ We regularly test and evaluate our measures;
- ✓ Our employees are informed and trained on the importance of personal data protection; and,
- ✓ We apply a "clean desk" principle at the end of the working day.

NOORDVLEES will store all personal data it has collected on site, in the cloud with data centres located in the EU or, in case the cloud data centres are not located in the EU, will ensure that the personal data is protected by one of the appropriate safeguards listed under 'V. Cross-border processing of personal data'.

Notwithstanding **(i)** NOORDVLEES' security policy, **(ii)** the checks it carries out and **(iii)** the actions it proposes in this context, an infallible level of security cannot be guaranteed. Since no method of transfer or transmission over the Internet, nor any method of electronic storage is 100% secure, NOORDVLEES cannot guarantee absolute security in this respect.

Finally, the security of your account will also depend on keeping your password and other account information confidential. NOORDVLEES will never ask for your password, nor will you be required to provide it yourself. If you have nonetheless communicated your password to a third party, this third party shall have access to your account and your personal data via your password. In such cases, you are liable for the transactions which occur as a result of the use made of your account. NOORDVLEES therefore strongly advises you to change your password immediately if you discover that someone has access to your account, and to contact NOORDVLEES immediately.

#### **IX. Update of Privacy Statement**

NOORDVLEES may update this Privacy Statement by posting a new version on the Website, whereby NOORDVLEES will indicate the date of revision at the top of the first page of this Privacy Statement. As such, it is strongly recommended to regularly consult the Website and/or Webshop and the page explaining the Privacy Statement, to make sure that you are aware of any changes.

#### **X. References to other websites**

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be directed to another website or Internet source that may knowingly or through the use of cookies or other technologies collect information about you. NOORDVLEES bears no responsibility, liability or authority of any kind for these other websites or Internet sources, nor for their collection, use and dissemination of your personal data. You must check the privacy policies of these other websites and internet sources yourself in order to judge whether they act in accordance with the Privacy Legislation.

#### **XI. Contact NOORDVLEES**

If you have questions about this Privacy Statement, or the manner in which NOORDVLEES collects, uses or processes your personal data, please contact us:

- By e-mail: [GDPR@noordvlees.be](mailto:GDPR@noordvlees.be),  
or
- By post: Bloemstraat 56, 2920 Kalmthout, Belgium (for the attention of Carlo van der Mast privacy officer at NOORDVLEES).

If you are dissatisfied with the way NOORDVLEES has handled these questions or comments or if you have any complaints about the way NOORDVLEES collects, uses or processes your data, you can lodge a complaint with the Data Protection Authority.