

## Privacy Statement of Van Eck Trailers B.V.

Last updated on December 2021

### 1. Introductions

This privacy statement of Van Eck Trailers B.V. ("Van Eck Trailers") is related to the processing of personal data of customers, suppliers and business partners. This privacy statement provides information about the processing of personal data by Van Eck Trailers.

In this privacy statement we describe who we are, how and for what purposes we process your personal data, how you can exercise your privacy rights and any other information that may be relevant to you.

We have tried to provide you with all information in a clear and legible manner. If you have any questions about our use of your personal data after reading this privacy statement, you can always contact us using the contact details below.

Email: [info@vanecktrailers.com](mailto:info@vanecktrailers.com)

Web page: <http://www.vanecktrailers.com/contact>

Phone number: +31 (0) 345686100

Address: Oude Waag 24, 4153 BV Beesd, The Netherlands

This privacy statement may be updated from time to time. This privacy statement has been in effect since November 2021. At the top of the page, you can see when this privacy statement was last updated.

### 2. When does this privacy statement apply?

This privacy statement applies to the processing of all personal data of our customers, suppliers and business partners. This privacy statement does not cover the processing of personal data of workers under their employment relationship with Van Eck Trailers. Van Eck Trailers does not use automated decision-making.

### 3. What is personal data?

Personal data is data that reveals something about you or that can be connected to you. You share personal data with us to make use any of our services. Examples of personal data include your name, your telephone number, your email address or your computer's IP address. It includes all data that we can connect to you.

### 4. Who is responsible for your personal data?

Van Eck Trailers and Tirsan Treyler Sanayi ve Ticaret Anonim Şirketi ("Tirsan") work together as strategic partners and are joint controllers within the meaning of the General Data Protection Regulation (GDPR). They are collectively responsible for the processing of all the personal data which are within the scope of this privacy statement. This privacy statement describes information on what personal data Van Eck Trailers collects and uses (processes), for what purpose and to what persons or entities it is shared with.

### 5. For what purposes do we process your personal data?

#### 5.1 For the conclusion and execution of agreements

When you have purchased a product or service from us as a customer or if you work with us as a supplier or business partner, we process your personal data for administrative purposes, such as sending invoices and making payments (debtors – and creditor management). In addition, we process your personal data for order

and shipment management, such as sending confirmations when products have been received and informing you about the delivery of products. Van Eck Trailers will process your personal data to execute our agreement.

For this purpose, we process your contact details, company details, payment information, invoice details, customer ID details and vehicle registration number. License plates are in principle linked to a company, which means that they can be qualified as company data. It is possible that Van Eck Trailers does business with self-employed (freelancer) persons, as a result of which the registration number of a vehicle can qualify as personal data. The legal basis for processing this personal data is the execution of an agreement and compliance with legal obligations (Article 6 sub b and c GDPR).

## 5.2 For relationship management and customer service

We use customer and supplier information stored in our database to manage supplier and customer relationships to provide (customer) service and support with product purchases. In addition, we process personal data to meet customer requirements, such as installation, maintenance and assistance with repairs. Even when dealing with requests from clients, for example road assistance and guarantee requests, we process personal data.

For this purpose we process your contact information, company information, financial data, ID data, data on past transactions and communication with Van Eck Trailers, information about telephone calls, copy of driver's license data on vehicle registration number of vehicle, T Ü V - , RDW - , EIPL - and DEKRA - inspection report, traffic map documents, insurance information and report on membership association . It is possible that Van Eck Trailers does business with self-employed (freelancer) persons, as a result of which the registration number of a vehicle can be qualified as personal data. The legal basis for processing this personal data is the performance of an agreement (Article 6 sub b GDPR).

## 5.3 For compliance with laws and regulations

We process your personal data to comply with laws and regulations, for example when tax or other business obligations apply. In order to comply with relevant laws and regulations, we may need to disclose your personal data to government agencies or supervisory authorities.

For this purpose, we process your contact information, financial data, operating data and information about transactions. The legal basis for processing this personal data is compliance with legal obligations (Article 6 sub c GDPR).

## 5.4 For the execution of business processes

We process your personal data regarding the functioning of our organization within our business operations. We offer central processing facilities to work more efficiently, such as processing personal data for supply chain and distribution management. Additionally, we perform audits, implementation of business controls and management and we use directories of customers, suppliers and business partners.

For this purpose, we process your contact details, company details, ID details, signature and professional information. The legal basis for processing this personal data is the legitimate interest of Van Eck Trailers (Article 6 sub f GDPR).

We monitor our IT systems to ensure compliance with our policies and regulations. During monitoring activities, your personal data can be accessed, and personal data can be viewed.

## 5.5 For marketing purposes

We process your personal data for marketing purposes when a new product is launched or to highlight other products and services. For example, we can inform you about offers and events. We also use your data for the development, execution and analysis of market research and marketing strategies.

For this purpose, we process personal data of (former) customers and potential customers. The personal data that we process herein concerns contact details and data about customer meetings. The legal basis for processing this personal data is the consent and the legitimate interest of Van Eck Trailers (Article 6 sub a and f GDPR).

### **5.6 To enable you to contact us**

We are active on social media platforms such as Facebook, LinkedIn, YouTube and Instagram. When you contact us via social media, we process your personal data to answer your questions and respond to your messages. In addition, if you visit the contact page of our website, you can contact us through various communication channels. We offer you contact details and a contact form; we process your personal data in order to answer your contact request.

For this we use the communication channel you have chosen to use to contact us and the personal data you provide to us. This includes your name, address, e-mail address, company details and the personal data you have included in your message. The legal basis for processing this personal data is the fact that you contact us and the permission you give to answer your message (Article 6 sub a GDPR).

### **5.7 To provide you with the functionalities of our website and for their technical and functional management**

If you use our website, we process technical data to offer you the functionalities of our website and so that our website administrators can manage and improve the products.

For this purpose, we process the personal data that you have entered on our website or that are generated by the functionalities you have used on our website and the technical data of your device, such as the IP address, the internet browser you use, the pages you have visited on our website or app, your clicking and surfing behavior, the length of your session and other diagnostic data. When you use our website on your mobile device, we process certain information, such as type of mobile device, IP address of mobile device and the unique ID of your mobile device. The legal basis for processing this personal data is the permission you give for this and the legitimate interest of Van Eck Trailers (Article 6 sub a and f GDPR).

## **6. Cookies**

We also collect personal data through cookies. Cookies are small files of information that store and retrieve information about your visit to this website – for example, how you arrived at our site, how you navigated the site and what information was of interest to you. Read more about how we use cookies in our <https://www.vanecktrailers.com/en/legal/cookie-policy/>.

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

### **7.1 Access to your personal data within Van Eck Trailers**

Your personal data may be exchanged with our strategic business partner located in Turkey as mentioned above. Our employees only have access to that personal data to the extent necessary to perform their work. All our employees are bound to secrecy.

### **7.2 Access to your personal data by third parties**

The following categories of parties have access to your personal data, where applicable, for the provision of their products or services to us:

- Business partners (e.g. Google);
- Suppliers (for example, our logistics partners and IT suppliers);
- Public authorities (e.g. regulators);
- Statutory Authorized Private Institutions (e.g. accountant).

When third parties access your personal data, we will take the necessary contractual, technical and organizational measures to ensure that your personal data is only processed to the extent that such processing is necessary. The third parties will only process your personal data in accordance with applicable law.

If your personal data is transferred to a recipient in a country that does not provide an adequate level of protection, we will do our best make sure that your personal data is adequately protected, such as signing standard contractual clauses with these recipients.

In other cases, your personal data will not be provided to third parties, except when required by law.

### **7.3 The use of your personal data by processors**

When a third party processes your personal data solely in accordance with the instructions of Van Eck Trailers, this party acts as a processor. We enter into an agreement with such a processor for the processing of personal data. This agreement contains obligations to ensure that your personal data is only processed by the processor who provides services to us.

### **8. How are your personal data secured?**

Van Eck Trailers has taken sufficient measures to guarantee the confidentiality and security of your personal data. We have implemented appropriate technical, physical and organizational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorized disclosure or access, as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. Examples include IT security policies, staff training, and secure servers.

### **9. How long is your personal data stored?**

Your personal data will be deleted or made anonymous when your personal data is no longer necessary for the purposes for which these personal data are processed or after the legal retention period has expired.

### **10. How can you exercise your privacy rights?**

You have the right to inspect an overview of your personal data and, under certain conditions, rectification and/or deletion of your personal data. In addition, in certain cases you also have the right to restrict the processing of your personal data, the right to object to the processing and the right to data portability.

To exercise your right of access, rectification, deletion, restriction, objection or data portability, please contact us using the contact details at the top of this privacy statement. Please note, we may request additional information to verify your identity when invoking these rights.

If you have given consent to the processing of your personal data for a particular purpose, you can at any time withdraw this consent. Please note that withdrawing your consent does not have retroactive effect. You can contact us about this via the contact details at the top of this privacy statement.

### 11. Can you make a complaint?

If you are dissatisfied with the use of your personal data by Van Eck Trailers, you have the option to submit a complaint to us via the contact details at the top of this statement. In addition, you have the right to submit a complaint to a data protection supervisory authority, in the Netherlands this is the <https://autoriteitpersoonsgegevens.nl/>, if you believe that we have not handled your personal data with care. For more information, please contact your local data protection supervisory authority.

### 12. How can you contact us?

If you have any questions about the processing of personal data by us that are not answered in this privacy statement, or if you have any comments or complaints, please contact us using the contact details at the top of this privacy statement.