

Customer Privacy Statement

Alkmaar, January 13, 2022

IB (ImpactBuying) B.V. (IB) is a Dutch company helping businesses by providing various supply chain and product related data services (**Services**) through the IB Platform (**IB Platform**). The IB Platform enables supply and product chain mapping and data sharing by producers, traders and large retailers (**Customers**), which provides them a single point of control to gather, verify, validate and manage its supply and product chain compliance and sustainability data and share such data with third parties.

In providing our Services, we mainly collect information on our Customers being companies, but we also need to collect personal data of you, as contact person of our (potential) Customer. Your trust in how we handle your personal data is important to us. When your company engages our Services, it is important to us to process your personal data carefully and securely in a transparent manner. In this Customer Privacy Statement of IB, we explain when we collect your personal data, what personal data from you we collect, how we use such personal data, and how long we keep your personal data. Please [let us know](#) if you have any questions.

This Customer Privacy Statement may be updated if required by new developments. We will inform you on material changes in this Customer Privacy Statement via our usual communication channels with you, such as via email and/or the IB Platform.

1. TO WHOM DOES THIS CUSTOMER PRIVACY STATEMENT APPLY?

This Customer Privacy Statement applies to our processing of your personal data as contact person of our (potential) Customer, when engaging our Services through our IB Platform, website and/or social media platforms. You can make use of our IB Platform by creating an account. The personal data we collect and process of you depends on your choices and interactions with us.

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

IB (Supply chain Information Management) B.V. (IB), headquartered in Alkmaar, the Netherlands, is the data controller for the processing of your personal data.

For some of our processing activities relating to the provision of our Services, IB may qualify as joint data controller with the company you work for or represent (our Customer), depending on the type of Services offered. Whether we qualify as joint controller is determined in the Controller-Controller Data Protection Agreement we have concluded with the company you work for or represent. In this agreement, we have determined who will notify a data breach to you, who is

obliged to inform you of the processing of your personal data and who will handle your requests as data subject. If you would like to know more about our respective responsibilities, please contact us.

3. WHAT PERSONAL DATA DO WE COLLECT?

We may process the following information about you, which may qualify as personal data:

- First and last name, function title, gender
- E-mail address, phone number
- Company name, company address, including country
- Username for user account, hashed password for user account
- IP address, type of your device, language preferences, operating system and browser
- Preferences regarding information, newsletters and other content
- Statistics and information regarding user behavior
- Content that you have provided, including postings on our social media platforms
- Other information that you voluntarily provide to us

4. HOW DID WE OBTAIN YOUR INFORMATION?

We primarily obtain information concerning you from yourself, when your company enters into an agreement with IB, when you create an account on our IB Platform, when you make use of our website and/or our social media platforms. We may also obtain personal data from third parties, to whom you have provided your consent to share your personal data with us, or when we perform an internet search.

5. WHY DO WE PROCESS THIS PERSONAL DATA AND WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA?

We may use your information for the following purposes, based on the following legal grounds:

Purposes	Legal grounds
<p>With respect the performance of our Services in general:</p> <ul style="list-style-type: none">• To provide our Services to your company• To allow you to create and use the	<p>Performance of a contract with you:</p> <p>We process your personal data to provide the functionalities of your account and the IB Platform, in order to meet our contractual obligation.</p>

<p>functionalities of the IB Platform through your user account</p> <ul style="list-style-type: none"> • To handle your requests as user of the IB Platform (e.g. information requests, demos of our Services) • To record your preferences in respect of our Services • To develop and optimize our Services (e.g. tool functionalities) • To exercise or defend legal claims. • To comply with legal obligations 	<p>Legitimate interests:</p> <p>The processing is necessary for legitimate interests pursued by us or of third parties. We have taken your privacy interests into account in the processing; therefore, when balancing these interests, our legitimate business interests prevail to the extent that they would conflict.</p> <p>Legal obligations:</p> <p>Processing is necessary to comply with our legal and regulatory obligations for administrative, accounting and tax purposes or if we are compelled to provide information to a government authority or law enforcement agency.</p>
<p>With respect to our sales and/or marketing activities:</p> <ul style="list-style-type: none"> • To get into and maintain contact with you (e.g. by our newsletter) • To inform you on and to promote our (new) Services • To obtain your views on certain matters, e.g. via (Customer satisfaction) surveys 	<p>Legitimate interests:</p> <p>We may process your personal data as necessary for achieving our legitimate interests pursued by us or third parties. For our business interests we may for example gather, analyze and interpret information about our Customers in order to find new opportunities to sell and develop Services to satisfy the preferences and needs of our Customers. We have taken your privacy interests into account in the processing; therefore, when balancing these interests, our legitimate business interests prevail to the extent that they would conflict.</p> <p>Consent:</p> <p>If required, we request your consent for processing your personal data for our sales and/or marketing activities. You can withdraw your consent at any time here by sending and <u>email</u>. If you withdraw your consent, this will not affect the lawfulness of our use of your personal data before your withdrawal.</p>

<p>With respect to our website and/or social media platforms:</p> <ul style="list-style-type: none"> • To provide you the best possible experience when visiting our website • To send you newsletters / blogs • To improve our Services 	<p>Consent:</p> <p>We request your consent for the usage of certain cookies via our website. See our Cookie Statement for more information on this.</p> <p>You can withdraw your consent at any time <u>sending and email</u>. If you withdraw your consent, this will not affect the lawfulness of our use of your personal data before your withdrawal.</p> <p>Legitimate interests:</p> <p>We may process your information as necessary for achieving our legitimate interests.</p> <p>In certain cases, we do not require your consent to use your personal data to contact you. This is for instance the case if you requested us to contact you via our contact page. We furthermore do not always require your consent to use your personal data for marketing purposes. This may for instance be the case if IB obtained your e-mail address via the website in the context of the sale of its Services and uses this e-mail address for direct marketing of its own similar Services. In these instances, we have a legitimate business interest for contacting you. See in this regard also the information on our marketing activities above.</p> <p>For the usage of some cookies, we do not require your consent. This is for instance the case for functional cookies that manage your language preferences. Here, IB has a legitimate interest to make a functional website available to you. See our Cookie Statement for further information on this.</p>
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We will not use your data for other purposes than the purposes mentioned in this Customer Privacy Statement.

We do not take decisions based on automated decision-making, including profiling.

decision from a competent court or supervisory authority.

6. HOW LONG DO WE RETAIN YOUR INFORMATION?

In general, IB retains personal data that are collected in the context of IB's activities no longer than necessary for the abovementioned purposes. This means in principle that we:

- will retain your personal data as contact person of our Customers, gathered in the context of IB's Services. The personal data will be deleted once the Services are terminated. We will retain your personal data as contact person of our Customers, gathered in the context of IB's provision of Services, for the duration of the Agreement with the Customer, and will delete your personal data ultimately five years after termination of the Agreement.
- We will retain your personal data as contact persons of our potential Customers no longer than five years after the last moment of interaction.

In deviation from the above, personal data will be retained longer by IB if a longer statutory minimum retention period applies or if this is necessary for legal proceedings.

7. WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

Your information will be processed by persons working for or on behalf of IB on a need-to-know basis for the purposes described above. Depending on the processing activities, persons working for our Customers that qualify as joint controller with IB might also have access to your personal data.

When we use services of a party who processes your personal data on our behalf, acting as a data processor, we have concluded appropriate data processor agreements in line with applicable data protection laws.

We use the following categories of third parties who may receive and process your personal data:

- Storage providers (servers)
- CRM-system providers
- Accounting and bookkeeping providers
- Communication providers (e-mail and chat systems)
- Marketing automation providers
- Software development providers

Please note that we may disclose personal data to third parties if we are required to do so by applicable law or a

8. HOW DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EEA?

Your personal data will be transferred to a location outside of the Economic European Area (EEA). When your personal data are transferred outside the EEA, we are required to ensure that it is subject to an equivalent level of protection as it would within the EEA. We take the steps necessary to ensure that your data is kept securely and handled in accordance with this privacy statement and applicable laws.

Where applicable, we have taken appropriate safeguards to transfer your personal data to a country located outside the EEA, if that country does not provide an adequate level of protection according to the applicable data protection laws, including standard contractual clauses approved by the European Commission. You can contact us if you would like to receive more information on the measures, we have taken to safeguard your information in this respect.

9. HOW DO WE PROTECT YOUR PERSONAL DATA?

We are committed to ensuring that your personal data is kept secure. In order to prevent unauthorized access or disclosure, we have put in place appropriate physical, technical and organizational measures to maintain the safety of your personal data. Some of the technical and organizational measures taken by us include: A security policy is in place, every employee or external party who work for IB must read and acknowledge the document. The policy contains basic rules in regards to information security. There are also other measures to ensure data security, like doing a penetration tests in the applications and running scans to find technical vulnerabilities.

Technical security measures:

- Logical and physical security equipment (e.g. safe, firewall, network segmentation)
- Technical control of the authorizations and keeping log files
- Management of the technical vulnerabilities (patch management)
- Making back-ups to safeguard availability and accessibility of the personal data
- Encryptions of connections and certain equipment
- Using multi-factor authentication for certain systems

Organizational security measures:

- Assignment of responsibilities for information security
- Promotion of security awareness among new and existing employees
- Establishment of procedures to test, assess and evaluate security measures periodically
- Checking log files regularly

- Implementation of a protocol for the handling of data breaches and security incidents
- Providing access to personal data to fewer people within the organization on a need to know basis

IB regularly reviews physical, technical and organizational security measures, and updates them where necessary.

10. WHICH PRIVACY RIGHTS DO YOU HAVE?

As a data subject, you have certain rights concerning our processing of your personal data.

You can:

- **Request access to your personal data held by us:** You can ask us whether we process your personal data and, if so, to provide you with a copy of that personal data.
- **Request us to rectify or complete your personal data:** If you believe the personal data we process about you is inaccurate or incomplete, you can ask us to rectify it.
- **Request us to erase certain personal data:** You can ask us to delete or remove your personal data in some circumstances.
- **Request us to restrict the processing of your personal data:** You can ask us to restrict the processing of your personal data in some circumstances, such as when you contest the accuracy of the personal data.
- **Object to our processing of your personal data:** You can object to our processing of your personal data and ask us to suspend such processing at any time if we rely on our own or someone else's legitimate interests to process your personal data or where we process your personal data for direct marketing purposes. When we rely on legitimate interests, we may continue processing your personal data if we can demonstrate compelling legitimate grounds, which we will consider on an individual basis. Where you object to our processing for direct marketing purposes, we will no longer process your personal data for such purposes.
- **Request not to be subject to automated decisions, including profiling:** You have the right not to be subject to a decision based solely on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you.
- **Request to port your personal data:** You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used, and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Request to withdraw your consent:** If we rely on your consent for processing your personal data, you have the right to withdraw that consent at any time.

Such withdrawal will not affect the lawfulness of the processing before you withdrew your consent.

- **Lodge a complaint with a supervisory authority:** If you have a concern about the way we have handled your personal data, you can lodge a complaint with your local supervisory authority (for the Netherlands, please see the [website](#) of the Dutch Data Protection Authority (Dutch only)).

You may send us a request. We will handle your request carefully and in line with the applicable data protection rules. We will respond to you without undue delay and at the latest within one month of receipt of your request in line with the applicable data protection rules. We may need to identify you and obtain proof of your identity in order to be able to respond to your request.

11. OUR CONTACT DETAILS

We welcome any questions, comments, or concerns regarding our processing of your personal data and/or our privacy practices. If you have any questions, or wish to exercise your privacy rights, please contact us by using the following contact details:

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 1812 RL Alkmaar
 The Netherlands

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