

Privacy Statement

1.1 Introduction

IB (ImpactBuying) B.V. is a Dutch company headquartered at Wognumsebuurt 1, 1817 BH Alkmaar, The Netherlands, that provides 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.

This privacy statement applies to all customers we engage with by providing our services through our IB Platform, website/and or social media platforms.

1.2 Data controller and data protection officer

For the purposes of GDPR, IB B.V. acts as the data controller when processing personal data of customers who use the IB Platform. For some processing activities relating to the provision of our services, IB may qualify as joint data controller with the 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 customer.

1.3 Personal data we collect

We may process the following information about our customers -specifically of users who interact with our platform- 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 device, language preferences, operating system and browser
- Preferences regarding information, newsletters and other content
- Statistics and information regarding user behaviour
- Content provided by the customer, including postings on our social media platforms
- Other information voluntarily provided to us by the customer

1.4 How we collect personal data

We primarily obtain information when a user creates an account on our IB Platform, or when a user utilises our website and/or our social media platforms after a customer enters into an agreement with IB. We may also obtain personal data from third parties to whom customers have provided consent to share their personal data with us.

1.5 Purpose of data processing

IB may use customer information for the following purposes, based on the following legal grounds:

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| <p>Purpose with respect to Service Delivery</p> <ul style="list-style-type: none"> • To provide IB services as described in this statement to the customer | <p>Legal basis for processing with respect to service delivery</p> <p>Meeting contractual obligations</p> |
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| <ul style="list-style-type: none"> • To allow the customer to create and use the functionalities of the IB Platform through the customers user accounts • To handle customer requests as a user of the IB Platform (e.g. Information requests, demos of IB services) • To record customer preferences in respect of IB services • To develop and optimize IB services (e.g. tool functionalities and features) • To exercise or defend legal claims • To comply with legal obligations | <p>We process personal data of customers to provide the functionality of user accounts and the IB Platform to meet contractual obligations.</p> <p>Legitimate interests with respect to service delivery</p> <p>The processing of personal data is necessary for legitimate interests pursued by IB or IB's third parties. IB has taken the privacy interests of its customers into account in the processing; therefore, when balancing these interests, IB's legitimate interests prevail to the extent that they would conflict.</p> <p>Legal obligations</p> <p>Processing is necessary to comply with the legal and regulatory obligations of IB for administrative, accounting and tax purposes or if IB is compelled to provide information to a government authority or law enforcement agency.</p> |
| <p>Purpose with respect to our sales and/or marketing activities:</p> <ul style="list-style-type: none"> • To get into and maintain contact with the customer (e.g. by our newsletter) • To inform on and to promote our (new) services to the customer • To obtain customer views on certain matters, e.g. via (Customer satisfaction) surveys | <p>Legitimate interests</p> <p>We may process customer personal data as necessary for achieving our legitimate interests pursued by us or third parties. For our business interests we may for example gather, analyse 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 the privacy interests of customers 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 the consent of the customer for processing their personal data for our sales and/or marketing activities. The customer can withdraw consent at any time here by sending an email. If consent is withdrawn, this will not affect the lawfulness of our use of customer personal data before withdrawal.</p> |
| <p>Purpose with respect to user experience and engagement</p> <ul style="list-style-type: none"> • To provide customers with the best possible experience when visiting the IB website • To send customers newsletters and blogs • To improve our services | <p>Consent (website/social media platforms)</p> <p>IB requests consent for the usage of certain cookies via the IB website. See the IB cookie statement for further information on this</p> <p>Consent can be withdrawn at any time by sending an email to privacy@impactbuying.com. This will not affect the lawfulness of IB's use of customer personal data before withdrawal</p> <p>Legitimate interests</p> |

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| | <p>IB may process customer information as necessary for achieving legitimate interests. In certain cases, IB does not require customer consent to use personal data to contact the customer. This is for instance the case if a customer requested IB to contact them via the IB contact page. IB furthermore does not always require customer consent to use its personal data for marketing purposes. This may for instance be the case if IB obtained a customer email 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, IB has a legitimate business interest for contacting the customer.</p> <p>For the usage of some cookies, IB does not require customer consent. This is for instance the case for functional cookies that manage customer language preferences. Here, IB has a legitimate interest to make a functional website available to the customer.</p> <p>IB will not use customer data for other purposes than the purposes mentioned in this Customer Privacy Statement.</p> <p>IB does not take decisions based on automated decision making, including profiling.</p> |
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1.6 Data retention

In general, IB retains personal data collected in the context of IB's activities no longer than necessary for the abovementioned purposes. This means in principle that IB will retain customer personal data gathered in the context of IB's Services. The personal data will be deleted once services are terminated or reach an end. The length of retention is defined contractually with customers prior to contract agreement.

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.

1.7 Data sharing

Customer 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 customer personal data. When we use services of a party who processes customer 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 customer 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 decision from a competent court or supervisory authority.

1.8 Transfer of customer personal data outside the EEA

Customer personal data will be transferred to a location outside of the Economic European Area (EEA). When customer personal data is 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 personal data is kept securely and handled in accordance with this privacy statement and applicable laws. Where applicable, we have taken appropriate safeguards to transfer 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. Customers can contact us to receive more information on the measures we have taken to safeguard your information in this respect.

1.9 Data security

We are committed to ensuring that personal data is kept secure. To prevent unauthorized access or disclosure, we have put in place appropriate physical, technical and organizational measures to maintain the safety of the personal data of our customers. Some of the technical and organizational measures taken by us include: A security policy, which is read and acknowledged by each employee or external party. The policy contains basic rules regarding 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.

1.9.1 Technical security measures:

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

1.9.2 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
- Regular check of log files
- Implementation protocols for the handling of data breaches and security incidents
- Access provision 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.

1.10 Data subject rights under GDPR

Data subjects have certain rights concerning our processing of personal data. Data subjects can:

- Request access to their personal data held by us: Data subjects can ask us whether we process their personal data and, if so, to provide them with a copy of that personal data.
- Request us to rectify or complete their personal data: If they believe the personal data we process about them is inaccurate or incomplete, they can ask us to rectify it.
- Request us to erase certain personal data: They can ask us to delete or remove their personal data in some circumstances.
- Request us to restrict the processing of their personal data: They can ask us to restrict the processing of their personal data in some circumstances, such as when they contest the accuracy of the personal data.
- Object to our processing of their personal data: They can object to our processing of their 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 their personal data or where we process their personal data for direct marketing purposes. When we rely on legitimate interests, we may continue processing their personal data if we can demonstrate compelling legitimate grounds, which we will consider on an individual basis. Where they object to our processing for direct marketing purposes, we will no longer process their personal data for such purposes.
- Request not to be subject to automated decisions, including profiling: Data subjects 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 them.
- Request to port their personal data: They have the right, in certain circumstances, to obtain personal data they 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 their choice.
- Request to withdraw their consent: If we rely on their consent for processing their personal data, they have the right to withdraw that consent at any time.
- Such withdrawal will not affect the lawfulness of the processing before they withdrew their consent.
- Lodge a complaint with a supervisory authority: If a data subject has a concern about the way we have handled their personal data, they can lodge a complaint with their local supervisory authority (for the Netherlands, please see the website of the Dutch Data Protection Authority (Dutch only)).

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

1.11 Contact information and complaints

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

IB (ImpactBuying) B.V. Wognumsebuurt 1 1817 Alkmaar the Netherlands info@impactbuying.com