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# **CONTACT INFORMATION**

- The public limited company "ALRO HOLDINGS", with registered office at Kruishoefstraat 52, 3650 Dilsen-Stokkem, RPR Antwerp, division Tongeren with VAT number BE 0450.073.565 (hereinafter "Alro Holdings");
- The public limited company "ALRO", with registered office at Kruishoefstraat 52, 3650 Dilsen Stokkem, RPR Antwerp, division Tongeren and VAT number BE 0437.678.450 (Hereinafter "Alro");
- The public limited company "WCA-Alro", with registered office at Oosterring 13, 3600 Genk, RPR and VAT number BE 0434.307.008 (hereinafter "WCA Alro"):
- The public limited company "Recitech", with registered office at Heulentakstraat z/n, 3650 Dilsen-Stokkem, RPR Antwerp, division Tongeren with VAT number BE 0437.726.851 (hereinafter "Recitech"); and
- The Slovakian company "Alro Slovakia", with registered office at Coburgova 84, 91701 Trnava (Slovakia), with VAT number SK 2022247535 (hereinafter "Alro Slovakia").

Alro Holdings, Alro, WCA-Alro, Recitech and Alro Slovakia are hereinafter collectively referred to as "Alro", "we" or "us". As such, your privacy is essential for us.

This privacy statement (hereinafter referred to as "Privacy Statement") is applicable, inter alia, to (i) our website htt-ps://www.alro-group.com (hereinafter referred to as the "Website"), (ii) any and all visits to the building of Alro and (iii) all (commercial) relations between Alro and its customers, prospects and business partners and

By accessing and using the website you explicitly agree to the following terms and conditions.

## INTELLECTUAL PROPERTY RIGHTS

The content of this site, including brands, logos, drawings, data, product or company names, texts, images and the like, is protected by intellectual rights and belongs to Alro or entitled third parties.

# **LIMITATION OF LIABILITY**

The information on the website is of a general nature. The information is not adapted to personal or specific circumstances, and may therefore not be considered personal, professional or legal advice to the user.

Alro makes great efforts to ensure that the information provided is complete, correct, accurate and updated. Despite these efforts, inaccuracies in the information provided may occur. If the information provided contains inaccuracies or if certain information is unavailable on or through the site, Alro will make the greatest possible effort to rectify this as quickly as possible.

However, Alro cannot be held liable for direct or indirect damage resulting from the use of the information on this site.

If you find inaccuracies in the information made available through the site, please contact the site administrator: info@alro.be.

The content of the site (including links) can be adjusted, changed or supplemented at any time without notice or notification. Also gives no guarantees for the proper functioning of the website and cannot be held liable in any way for poor performance or temporary (un)availability of the website or for any form of damage, direct or indirect, that would result from access to or use of the website.

Under no circumstances can Alro be held liable to anyone, in a direct or indirect, special or other way for damage resulting from use of this site or any other, in particular as a result of links or hyperlinks, including, without limitation, to any losses, work interruptions, damage to programs or other data on the computer system, equipment, software or other of the user.

The website may contain hyperlinks to websites or pages of third parties, or refer to them indirectly. The placement of links to these websites or pages in no way implies an implicit approval of their content.

Alro expressly declares that it has no control over the content or other features of these websites and can under no circumstances be held liable for the content or features thereof or for any other form of damage caused by its use.



# APPLICABLE LAW AND COMPETENT COURTS

This website is governed by Belgian law. In the event of a dispute, only the courts of the district of Hasselt have jurisdiction.

# PRIVACY POLICY

Alro shall process personal data in accordance with this privacy statement.

Alro wishes to emphasize that it always attempts to act in accordance with the "Privacy Legislation", being (i) the Belgian Privacy Law of 8 December 1992 on privacy protection in relation to the processing of personal data and/or (ii) the EU Regulation of 2016/679 of 27 April 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC and (iii) all (future) Belgian laws regarding the implementation of this Regulation.

By visiting the Website, using Alro's services, purchasing Alro's products and/or goods or engaging in any type of communication with Alro, you expressly consent (by providing your personal data or opting in) to the Privacy Statement and therefore the way Alro collects, uses and processes your personal data.

For more information, or if you have questions or comments regarding our privacy policy, please contact privacy@alro.be.

## **TYPES OF PERSONAL DATA**

Alro can collect and process the following personal data:

- Name
- Surname
- · E-mail address
- Telephone number (landline and/or mobile phone)
- · Client number
- Company
- · License plate
- · Security footage
- IP-address
- · All personal data included in an e-mail sent via the contact information as mentioned on the Website
- All other personal data voluntarily provided to Alro (e.g. in the course of correspondence)

Alro also automatically collects anonymous information regarding your use of the Website. As such, Alro shall, for example, automatically log which sections of the Website you visit, which web browser you use, which website you visited when you obtained access to the Website. We cannot identify you through these data, but it allows Alro to draw up statistics regarding the use of the Website.

## **METHODS OF PERSONAL DATA COLLECTION**

These personal data are collected in the context of:

- · Visiting the Website
- A collaboration with Alro
- Incoming and outgoing correspondence with Alro
- · Visiting the building/the establishments of Alro
- · The request of a price quotation
- The use of services rendered by Alro
- · The exchange of business cards
- The verification of your identity (for example when contacting the client service desk)

All personal data, collected by Alro, are thus expressly and voluntarily provided by you.



## **USE OF PERSONAL DATA**

Alro can use your personal data for the following purposes:

- Performance of the agreement with Alro (incl. follow-up thereof)
- Responding to questions (whether or not received through the contact form)
- Optimising the quality, management and content of the Website
- · Sending of newsletters
- · Creating statistics
- The drafting of a price quotation (and sending out thereof)
- · Follow-up on a meeting
- Registration of visitors of the building/establishment of Alro
- Sending of invoices and collection of payments

# **RECHTSGROND(EN) VAN DE VERWERKING**

Processing takes place on the following legal grounds, as the case may be:

- · You have given consent to the processing of your personal data for one or more specific purposes
- Processing is necessary for the performance of the agreement with Alro or in order to take steps at your request prior
  to entering into an agreement
- Processing is necessary for compliance with a legal obligation to which Alro is subject
- Processing is necessary for the purposes of the legitimate interests pursued by Alro or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child).

#### **DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

Alro shall not disclose your personal data to third parties, unless it is necessary in the context of performing the agreement and optimisation thereof (including but not limited to processing of payments (for example Isabel) and the provision of services (of all kind) to Alro (such as for example but not limited to services with regard to subcontracting). In this respect, your personal data may be disclosed among others to payment providers, software providers, cloud partners, transport partners, financial institutions, insurance companies, external service providers (such as for example an auditor).

If it is necessary that Alro discloses your personal data in this regard to third parties, the third party concerned is required to use your personal data in accordance with the provisions of this Privacy Statement.

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

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

In all other cases, Alro 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 completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of the processing of your personal data.

## **CROSS-BORDER PROCESSING OF PERSONAL DATA**

Any transfer of personal data outside the European Economic Area (EEA) to a recipient whose domicile or registered office is in a country which does not fall under the adequacy decision enacted by the European Commission, shall be governed by the provisions of a data transfer agreement, which shall contain (i) the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or (ii) appropriate safeguards by any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data.



#### STORAGE OF PERSONAL DATA

Unless a longer storage period is required or justified (i) by law or (ii) through compliance with another legal obligation, Alro 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'.

#### **YOUR PRIVACY RIGHTS**

In light of the processing of your personal data, you enjoy the following privacy rights:

- · Right of access to 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;

If you wish to invoke your privacy rights, please contact privacy@alro.be.

#### **SECURITY OF PERSONAL DATA**

Alro undertakes to take appropriate and reasonable physical, technological and organisational precautions in order to avoid (i) unauthorised or unlawful access to your personal information, and (ii) loss, abuse or alteration of your personal data.

Alro will keep all personal data, which she has collected, on the servers situated on the premises of Alro, as well as on a shared drive and servers of third parties (such as but not limited to mail server, CRM, etc.).

Notwithstanding the (i) Alro's 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 transmission or forwarding over the internet, or any method of electronic storage is 100% secure, Alro is, in this context, not in a position to guarantee absolute security.

#### **UPDATE PRIVACY STATEMENT**

Alro is entitled to update this Privacy Statement by posting a new version on the Website. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Statement, to make sure that you are aware of any changes.

## **OTHER WEBSITES**

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. Alro does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

#### **CONTACT ALRO**

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

- Via e-mail: privacy@alro.be,
- Via post: Alro NV, Kruishoefstraat 52, BE-3650 Dilsen-Stokkem

In case you are not satisfied with the way Alro handled your questions or remarks or have any complaints about the way Alro collects, uses and or processes your personal data, note that you have the right to lodge a complaint with the Commission for the Protection of Privacy (Drukpersstraat 35, 1000 Brussels - commission@privacycommission.be).

### **DIRECT MARKETING**

The customer has the right to object free of charge to any processing of their personal data with a view to direct marketing.



# **USE OF COOKIES**

During a visit to the site 'cookies' can be placed on the hard drive of your computer. A cookie is a text file that is placed by the server of a website in the browser of your computer or on your mobile device when you consult a website. Cookies cannot be used to identify people; a cookie can only identify a machine.

You can always consult and adjust your cookie preferences by clicking on the "Cookie settings" button in the bottom right of the website screen.

## WHICH COOKIES DOES ALRO USE AND FOR WHAT PURPOSE(S):

#### 1. NECESSARY COOKIES

The necessary cookies are used for:

- Correct functioning of the website at the server level
- · Correct functioning of the cookie choice
- Better performance and error detection
- · Keeping track of settings
- Fraud monitoring
- Chat support

#### 2. ANALYTICS COOKIES

#### Google

A cookie will be placed by the US company Google via our website, as a part of the "Analytics" service. We use this service to maintain a record and to obtain information about how visitors use the website. Google may provide this information to third parties if it is legally bound to do so, or insofar as third parties process the information on behalf of Google. We have no influence over the same. We have/not permitted Google to use this analytics information for other Google services.

The information that Google collects will be anonymous to the extent possible. It is expressly stated that your IP address will not be provided. The information will be transmitted to and shall be stored by Google on servers in the USA. Google claims to adhere to the Safe Harbor principles and is a member of the Safe Harbor program of the US Department of Commerce. This means that there is an adequate level of protection for the processing of personal data if any.

- Purpose: Google Universal Analytics is an analytics tool that we use to measure how visitors use our websites and apps. The tool uses a number of cookies to collect information and statistics about our websites and apps without personally identifying visitors.
- Third-party cookies placed and managed by Google
- Cookies: \_ga, \_gid, \_gat

## **ENABLING, DISABLING AND DELETING COOKIES**

You can set up your internet browser so that cookies are not accepted, or you receive a warning when a cookie is installed, or cookies are subsequently removed from your hard drive. You can do this via your browser settings (via the help function). Keep in mind that certain graphic elements may not appear correctly, or that you may not be able to use certain applications.

