

### **HEMPFLAX GROUP B.V.**

Hendrik Westerstraat 20 9665 AL Oude Pekela The Netherlands

+31 (0)597 615 516 www.hempflax.com info@hempflax.com

# **Privacy Policy**

HempFlax Group B.V. (registered with the Chamber of Commerce under number 10145305, branch number 18551335), hereinafter referred to as: **HempFlax**, is (via its subsidiaries) active at several locations:

## The Netherlands

- HempFlax B.V., COC 02332420
- HemPure B.V., COC 65049950

### Germany

- Hempflax Deutschland GmbH, HRB 204206

### Romania

- HEMPFLAX EUROPE S.R.L., CUI 31139980, J01/48/2013
- DRONKERS GROND S.R.L., CUI 33104954, J1/290/2014
- AGRAFICIENT S.R.L., CUI 31059733, J1/7/2013

HempFlax considers the protection of your personal data to be very important. In this Privacy Policy we wish to provide clear and transparent information about how we handle personal data. We do everything possible to safeguard your privacy and therefore handle personal data with great care. HempFlax complies in all cases with the applicable laws and regulations, including the General Data Protection Regulation. This means in any event that:

- We process your personal data in accordance with the purpose for which they had been provided, these purposes and types of personal data are described in this Privacy Policy;
- Processing of your personal data is limited to only those data which are minimally required for the purposes for which they are processed;
- We will ask your express permission if we need this to process your personal data;
- We have taken suitable technical and organisational measures so that the protection of your personal data is guaranteed;
- We will not pass personal data on to third parties unless this is required for the performance of the purposes for which they have been provided;
- We are aware of your rights relating to your personal data, to point these out to you and to respect such rights.

At HempFlax we are responsible for the processing of your personal data. If after having read this Privacy Policy you have any further questions relating to this or in a more general sense or you would like to contact us, please do so via the contact details at the bottom of this document.

# **Processing personal data**

HempFlax has prepared overviews showing which personal data it processes. A distinction is made between general personal data and special personal data. The overview makes clear for which purpose we record personal data and the grounds for this. We also make clear for how long we retain the data. The retention periods are determined on the basis of the law and/or appropriate decision. For more information about the General Data Protection Regulation, please visit the website of the Central Government.

Chamber of Commerce: 10145305 | VAT: NL8050 859 20 B01 | IBAN: NL29ABNA0563467509 | BIC: ABNANL2A



# **Provision to third parties**

We can provide the data you have provided to us to third parties if this is necessary for the performance of the purposes set out above.

For instance, we use a third party to:

- Look after our ICT and internet environment;
- Look after our (financial) administration;
- Look after our payroll records;
- Protect our and your property with the aid of security cameras.

We will never pass on personal data to other parties with whom we have not entered into a processor's agreement. In such a processor's agreement we of course come to the required agreements with these parties (processors) to safeguard your personal data. In addition, we will not provide the data you have provided to us to other parties unless this is required and permitted by law. An example of this would a police request for (personal) data in the context of an investigation. In such a case we must cooperate and are then also obliged to provide these data. We can also share personal data with third parties if you have given us your written permission for this.

### Within the EU

We do not provide personal data to parties who are based outside the EU.

#### Minors

We only process personal data of minors (persons who are younger than 16) if written permission has been given for this by the parent, carer or legal representative insofar as the law requires permission to be given for this.

## Retention period

HempFlax does not retain personal data longer than is required for the purpose for which they have been provided or are required on the basis of the law or an appropriate exemption.

# **Protection**

We have taken suitable technical and organisational measures to protect your personal data against unlawful processing, this includes the following measures for example:

- All persons who on behalf of HempFlax could take note of your details are under a duty of confidentiality;
- We have a username and password policy on all our systems;
- We ensure personal data are pseudonymised and encrypted if there are reasons for doing so;
- We make back-ups of the personal data to be able to restore them in the event of physical or technical incidents;
- We regularly test and evaluate our measures;
- Our employees are informed of the importance of personal data protection and have subscribed to a non-disclosure agreement.

## Rights relating to your data

You have the right to inspect, rectify or remove the personal data we have received from you. You can also object to the processing of your personal data (or part of such) by us or by one of our processors. You also have the right to have the data you have provided transferred by us to yourself or, on your instruction, directly to a different party. We can ask you to prove your identity before we are able to process the above requests.

If we are permitted to process your personal data on the basis of permission you have given to us to this end, you always have the right to withdraw this permission. If you would like to contact us regarding your rights relating to the processing of personal data, please use the contact details below.



## **Complaints**

Should you have a complaint about the processing of your personal data, please contact us directly. We will endeavour to solve the issue with you promptly. You always have the right to lodge a complaint with the Dutch Data Protection Authority [Autoriteit Persoonsgegevens], this is the supervisory authority in the field of privacy protection.

### Changes

This privacy statement is subject to change. There may be changes in the nature of the data which we process and the purpose or the security measures we take. We aim to adjust the rules relating to privacy in line with the most recent statutory provisions. We invite you to regularly inspect our privacy statement.

# Questions

If you have any questions or comments as a result of our Privacy Statement, please contact us.

## **Contact details**

HempFlax Group B.V. attn. data protection officer Hendrik Westerstraat 20-22 9665 AL Oude Pekela

Tel.: +31 597 615 516 | e-mail: hrm@hempflax.com

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