

# Privacy and cookie statement

## Mani Bhadra B.V. - Phoenix Import

Through the Phoenix Import web shop, privacy-sensitive and personal data are being processed. Mani Bhadra B.V. highly values a safe processing and protecting of personal data. Therefore, personal data are processed carefully and secured in accordance with applicable Dutch law and legislation.

This means we:

- **Clearly specify our purposes** before we process personal data, by using this Privacy Statement;
- **Limit our collection of personal data** to only the personal data needed for legitimate purposes;
- **First ask for explicit permission** to process your personal data in cases where your permission is required;
- Take **appropriate security measures** to protect your personal data and we demand the same from parties who process personal data on our behalf;
- **Respect your right to inspect, correct or delete your personal data held by us.**

Mani Bhadra B.V. is the party responsible for all data processing. In this privacy statement, we will explain which personal data we collect and for which purposes. We recommend that you read it carefully.

*This privacy statement was last amended on 26-07-2018.*

### Use of Personal Data

By using our services, you are providing certain data to us. This could be personal data. Mani Bhadra BV only retains and uses the personal data provided directly by you for using our services or for which it is clear that it has been supplied to us to be processed.

We use the following data for the purposes as mentioned in this Privacy Statement:

- Name and address
- Telephone number
- Billing address
- Email address
- Payment details
- VAT number for cross border transactions
- Fields of interest
- Order history

### Purpose of Personal Data

Mani Bhadra BV collects and uses personal data of its customers for these purposes:

- To create and manage your personal account
- For providing our services and billing
- To process your orders and returns via our online services and to inform you about the progress of them
- To contact you in case of problems with the delivery of your ordered goods
- For sending marketing information like newsletters
- To verify your identity and to prevent fraude or misuse of our services

### Registration

To view our prices, you first have to register to our webshop. After your registration has been approved, we will retain your user name and the personal data you provided. We will retain this data so you do not have to re-enter it every time you visit our website, to contact you in connection with the execution of the agreement, invoicing and payment, and to provide an overview of the products and services you have purchased from us.

We will not provide the data linked to your user name to third parties, unless it is necessary for the execution of the agreement you concluded with us or if this is required by law. In the event of suspicion of fraud or misuse of our website we may hand over personal data to the entitled authorities.

### **Our portal**

When accessing our portal, you can set, specify and change your (personal) data yourself.

### **Handling your order**

We will use your personal data when handling your order. If necessary for proper handling, we provide your data to third parties. See 'Provision to third parties' for a more detailed explanation.

### **Promotions and news**

Other than the advertisements on the website, we can inform you about new products or services:  
- by e-mail

We provide a digital newsletter to those interested in our promotions, (new) products and/or services. Your email address will be added to the list of subscribers only after your explicit consent. The newsletter is sent twice a month. Each newsletter contains a link in the footer with which to unsubscribe easily from our newsletter.

### **Contact form and Report on delivery**

Via our webshop we offer the possibility to ask questions by means of a contact form, where you are asked to fill in various data for us to be able to deal with your question. You can choose which data you are willing to provide. The data you provide will be saved for the time needed to handle and answer your questions well. When you want to send a report on damaged, missing or wrongly delivered good(s), we ask you to fill in our Report on delivery form. This form is accessible when you are logged in to your account. The data you provide will be saved for the time needed to handle your report well.

### **Publication**

We do not publish your customer data.

### **Provision to third parties**

We may share some of your personal data with our partners. These partners are involved in the execution of the agreement. Our shipping partner DPD for example receives your name, address, phone number and e-mail address to ensure that you can track your order and that your goods arrive to the right destination. In this case you will receive an email directly from DPD. We have agreements with our third party partners about how to handle the data we provide. Our partners will only use this information for the purpose of executing the agreement.

### **Cookies**

On our website we make use of cookies. Also, cookies are placed by third parties we have an agreement with. Cookies are small text files that are stored on the hard disc of your computer/tablet/cell phone when you visit a website. These cookies are used to improve the functioning of the Mani Bhadra BV websites and to monitor online customer visit to track the number of people that visit the website in a certain period of time. Mani Bhadra BV only uses general data that cannot be traced back to one computer or person. Cookies are also used to facilitate website navigation by storing login names, passwords and (language-) preferences.

When you first visit our online store, you will receive a notification which explains why we use cookies. The moment you do not consent to the use of cookies, we are not allowed and will not use your data. You are free to disable the use of cookies via your browser. Keep in mind that it is possible that our website will no longer work optimally after doing so.

With third parties, we have made agreements about the use of cookies and applications in line with our privacy and cookie statement. However, we do not have complete control over what the providers of these applications do with the cookies when they process them. For more information about these applications and how these third parties deal with cookies, we refer to the privacy statements of their websites (note: these statements are updated from time to time).

### **Google Analytics**

We use Google Analytics to track visitors on our website and to get reports about how visitors use our web shop. We have made an agreement with Google on the handling of our data. We do not allow Google to use the obtained Analytics information for other Google services. And we anonymize the IP addresses.

### **Integration of the Trusted Shops Trustbadge**

In order to be able to show our Trusted Shops seal of approval and the available Trusted Shops products after placing an order, the Trusted Shops Trustbadge is integrated on this website.

After weighing various interests, this protects the legitimate prevailing interests for optimal marketing of our services. The Trustbadge and the advertised services are a product of TRUSTED SHOPS GmbH, Subbelrather Str. 15C, 50823 Cologne, Germany. When a Trustbadge is requested, the web server automatically saves a so-called server log file in which your request with, for example, your IP address, the date and time of the request, the amount of data sent and the name of your internet provider (access data) is documented. These access data will not be processed and will be automatically overwritten at the latest 7 days after your last visit to the web page. Other personal data will only be passed on to Trusted Shops when you choose to use the Trusted Shops products after placing an order or if you are already registered to their use. In that case the contract between you and Trusted Shops applies.

### **Security**

Mani Bhadra BV takes careful and appropriate measures on system security to prevent unauthorized parties to gain access to personal data or that personal data will get lost. We take security measures to reduce misuse of and unauthorized access to personal data.

### **Retention period**

The personal data described above are retained for as long as necessary to process your orders, including warranty. We then store data for a maximum of one year for the statistical purposes described. After that period, the data will be erased unless there is a statutory obligation that requires longer storage (such as the seven-year fiscal retention obligation for payment data). If your online account has not been used for three years, it will be deleted.

### **Third party websites**

This privacy statement does not apply to websites of third parties that are linked to our web shop. We cannot guarantee that these third parties handle your personal data in a reliable or secure manner. We encourage you to read their privacy statements on their websites before using their websites.

### **Changes to this privacy and cookie statement**

We reserve the right to modify this privacy- and cookie statement. We recommend that you review this statement regularly, so that you remain informed of any changes.

### **Inspection and modification of your data**

For questions about our privacy policy or questions regarding access and changes to (or deletion of) your personal data, you can contact us at any time via the contact information below.

You can also send us a request to view, change or delete this data. You can also request a data export to view the data that we use with your consent or provide (a motivated) statement that you want us to limit the processing of personal data.

To prevent misuse, we can ask you to identify yourself adequately. When it comes to access personal data linked to a cookie, you must send a copy of the cookie you inquire about. You can find these in the settings of your browser. If the details are not correct, you can request that we change or remove the data.

### **Dutch Data Protection Authority**

Of course we are happy to help you if you have complaints about the processing of your personal data. Under the Dutch privacy legislation, you also have the right to file a complaint with the Dutch Data Protection Authority against the processing of personal data. You can contact the Dutch Data Protection Authority for this (<https://autoriteitpersoonsgegevens.nl/en>).

### **General Data Protection Regulation**

With the enactment of the General Data Protection Regulation (GDPR, installed EU law as of May 25th 2018) you are protected by more and better privacy legislation, as mentioned below:

### 1. Right to inspection

As a customer under European law, you have the right to inspect your personal data. You can ask us at any time to inspect the data we have of you. We then have to tell you:

- What personal data we use;
- What the exact content of that data is;
- For what purpose it is used;
- To whom we (possibly) provide your data;
- What the origin of the data is.

You only have the right to inspect your own personal data. A request for inspection is best done in writing or via e-mail. As an organisation, we are obliged to respond to your request for perusal within 4 weeks in writing or by e-mail.

### 2. Right to rectification and amendment

You have the right to have any incorrect personal data changed, or to amend your personal details. We are responsible for ensuring that the personal data we process are accurate. We will update this data when necessary. Also, we will inform third parties that your details have been modified or amended when this is needed.

### 3. Right to forgetfulness

The General Data Protection Regulation also provides in the so-called right to forgetfulness. This right means that an organisation is obliged to erase someone's personal data in a number of cases, when this is requested. The right to forgetfulness applies to the following situations:

- Data are no longer necessary;
- Withdrawal of consent;
- Objection;
- Unlawful processing;
- Lawful retention period has ended.

### 4. Right to data portability

The right to data portability is the right to transfer personal data. This is a new right that you have in addition to the existing privacy rights. You can use this right when you decide not to be a customer with us anymore and/or start using the services of another organisation.

The data covered by this right consists of digital data only. Paper files are therefore not covered within this law. It concerns digital personal data that we, as an organisation, process with your consent and/or to execute our agreement(s) with you.

This right does not automatically mean that we (have to) destroy your data after the transfer. As long as you are a customer with us, we must continue to process your personal data for the necessary and justified purposes of our organisation.

### 5. Right to limit processing

In certain situations, there is the right to limit the use of data. This applies in the following situations:

- Data may be incorrect
- The processing is unlawful
- Data is no longer needed
- The person concerned objects

When your personal data are provided to third parties, we will inform them that we have limited the data use and request them to do the same.

### 6. Right of objection

You have the right to object to the processing of your personal data. We process your personal data on the grounds of legitimate interest (performing a regular business activity). When you object, we are obliged to stop processing your personal data.

### **Our contact details**

Mani Bhadra B.V. - Phoenix Import

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