

# **PRIVACY POLICY**

Cleanbudz B.V.

This privacy policy provides the user [Data Subject] with information about how CleanBudz B.V. [ hereinafter referred to as “us” “we” “our”] collects, uses, processes, and protects your Personal Data. This Privacy Policy is also responsible for informing you about your rights and provision of consent when providing your Personal Data.

CleanBudz B.V. respects the privacy of its Web Shop and Website visitors. We have therefore formulated, adopted and implemented this Policy with the aim of being fully transparent with our customers regarding the processing and controlling of Personal Data, its purpose(s) and the customer’s ability of exercising rights guaranteed under the General Data Protection Regulation (GDPR) EU 2016/679

Furthermore, this Privacy Policy is drafted to reflect Data Protection Rights as is adopted in the European Union and under the Law of The Netherlands.

We will not place any non-anonymised analytical cookies and/or tracking cookies on your computer, mobile phone, tablet or electronic device granting access to our website until you explicitly give consent for the use of cookies and other tracking devices by clicking the box on ‘PUK NOW / I accept’ upon your first visit to our Web Shop or Website.

If you require additional information about the protection of Personal Data, please visit the website of the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*): <https://autoriteitpersoonsgegevens.nl/nl>

This version of the Privacy Policy represents the current version in use, and it is the only version that applies while visiting our Web Shop or Website until a new version replaces the current version. No legal rights can be invoked, nor can damages be claimed on rights guaranteed by an older version of this Policy once an updated version has been enforced.

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## Definitions

1. 'Website' means a virtual domain for granting access to person(s) to the Enterprise's catalogue and portfolio online
2. 'Web Shop' means a virtual marketplace belonging to the Enterprise where goods are sold and purchased using a registered Payment Service Provider as means of payment
3. 'Data Subject' means an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
4. 'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction
5. 'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller
6. 'Controller' means the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law
7. 'Consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her
8. 'Enterprise' means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity
9. 'Supervisory Authority' means an independent public authority which is established by a Member State pursuant to Article 51 GDPR

## Web Shop and Website Access

### Article 1 – Access to the Web Shop and Website

1. Access to and use of our Web Shop and Website is and remains strictly personal. All persons, regardless of their legal form, will refrain from using the data and information of this Web Shop and Website for their own commercial, political, or advertising purposes, as well as for any commercial offers, in particular unsolicited electronic offers.
2. All brands, images, texts, comments, illustrations (animated) images, video images, sounds, and all the technical applications that can be used to operate this website and more generally all the components used on this website, are protected by the laws on intellectual property. Any reproduction, repetition, use or modification, by any means whatsoever, of all or just part of it, including technical applications, without the prior written permission of the Company, is strictly prohibited. The fact that the controller may not take immediate action against any infringement, cannot be considered as a tacit or implied consent of the Company, nor of a waiver of any right to prosecute the infringing party.

### Article 2 – Collection of Data

1. Your personal data will be collected and processed by CleanBudz B.V. when you provide us with such information by:
  - a. Registering online or placing an order for any of our products and/or services
  - b. Voluntarily complete a customer survey or provide feedback on any of our message boards or via email or any other electronic means of communication utilized by the Enterprise.
  - c. Using and/or viewing our Website and Web shop via your browser's cookies and other tracking devices
2. Personal data means any information relating to an identifiable natural person ('Data Subject')
3. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

4. All personal data collected by the Enterprise on the Website or Web shop are used mainly by the collector in order to maintain a (commercial) relationship with you, and if applicable, in order to process your orders. All data collected are recorded in an (electronic) register.
5. All collected data by the Enterprise on the Website or Web shop is able to share your data with any of our partner companies so that they may offer you their products and/or services.
6. When the Enterprise collects data by processing an order, it may be required to comply with requests from governmental authorities and/or financial institutions to identify suspicious activity and establish fraudulent behavior. Upon establishment thereof, all personal data collected will no longer be protected by the provisions of this Privacy Policy.

### Article 3 – Data Protection Rights

1. Under this Privacy Policy the GDPR is applicable, and the rights of the data subject are guaranteed pursuant to all applicable data protection clauses as prescribed by the former. Pursuant to the GDPR all users have:
  - a. The right to information and access to all personal data the Enterprise has collected on the user. In order to receive copies from our system there is an applicable fee of €7,95 (excluding VAT) for such access.
  - b. The right to rectification in which the data subject requests the Enterprise to correct or amend any information the data subject believes to be inaccurate.
  - c. The right to erasure of all data collected by the Enterprise under certain conditions specified in our Company Policy
  - d. The right to restrict or object processing of personal data under certain conditions specified in our Company Policy
  - e. The right to data portability where the Enterprise transfers the data collected to another organization, or directly to the data subject, under certain conditions specified in our Company Policy
2. Once a data subject has submitted a request to exercise their rights guaranteed under the GDPR, our Enterprise will be in contact with the data subject within thirty (30) days. Dependent on the complexity of any given case, such thirty-day period can be extended with a period of thirty (30) days.
3. Website use is not intended for anyone under 18 years of age. No one under age 18 may provide any personal information to or on the Website. CleanBudz B.V. does not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or on or through any of its features, register on the Website, make any orders through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself

to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

4. If our technical department learns they have collected or received personal information from anyone child under 21, we will delete that information. If you believe we might have any information from anyone under 21, please contact us at [info@cleanbudz.eu](mailto:info@cleanbudz.eu)
5. Data subject is at all times entitled to opt-in and to opt-out of receiving communications from CleanBudz B.V. and its affiliated brands. In case data subject wishes to have their data removed from our database, contact is to be made with our Back Office with an online request by email sent to [info@cleanbudz.eu](mailto:info@cleanbudz.eu)

#### Article 4 – Disclosure of data

1. CleanBudz B.V. may disclose aggregated information about its users, with exclusion of personal identifiable data, without any restriction. Collected data may be disclosed under this Privacy Policy with
  - a. Our subsidiaries and affiliated entities
  - b. Our holdings and groups
  - c. Contractors, service providers and any other third party used in the support, functioning and operation of our economic activities
  - d. Buyer, successor in the event of a merger, restructuring, reorganization, dissolution, or any other sale or transfer of some or all of CleanBudz B.V.'s assets, whether in part of bankruptcy or liquidation proceedings, in which personal data held by CleanBudz B.V. about its users is among the assets transferred
  - e. To fulfil the purpose for which the data subject has provided it
  - f. For any other purpose disclosed by CleanBudz B.V. when the user provides the information
  - g. Consent of the user or data subject
  - h. To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
  - i. To enforce or apply our terms of use and other agreements, including for billing and collection purposes
  - j. If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of CleanBudz B.V., its customers, or others

#### Article 5 – Intellectual Property

1. The Website and its entire contents, features and functionality (including but not limited to all information, software, text, displays, images, video and audio, and the design, selection and arrangement thereof), are owned by the Company, its licensors or other providers of such material and are protected by European Union and international

copyright, trademark, patent, trade secret and other intellectual property or proprietary rights laws.

2. Data subject is permitted to use the Website for personal or business use only. One must not reproduce, distribute, modify, create derivative works of, publicly display, publicly perform, republish, download, store or transmit any of the material on our Website, except as follows:
  - a. Your computer may temporarily store copies of such materials in RAM incidental to your accessing and viewing those materials.
  - b. You may store files that are automatically cached by your Web browser for display enhancement purposes.
  - c. If we provide desktop, mobile or other applications for download, you may download a single copy to your computer or mobile device solely for your own personal, non-commercial use, provided you agree to be bound by our end user license agreement for such applications.
  - d. If we provide social media features with certain content, you may take such actions as are enabled by such features.
3. If the user prints, copies, modifies, downloads, or otherwise uses or provides any other person with access to any part of the Website in breach of this Privacy Policy, their right to use the Website will cease immediately and they must, return or destroy any copies of the materials made. No right, title or interest in or to the Website or any content on the Website is transferred to, and all rights not expressly granted are reserved by the Company.
4. The Company name, the terms, the Company logo and all related names, logos, product and service names, designs and slogans are trademarks of the Company or its affiliates or licensors. Users are explicitly prohibited to use such marks without the prior written permission of the Company. All other names, logos, product and service names, designs and slogans on this Website are the trademarks of their respective owners.