

# PRIVACY NOTICE

## 1. General

This Privacy Notice sets out the basis on which we will process any personal information that we collect from you when you use our online services, contact us (such as via telephone, an online contact form or email, etc.), place an order, use our online calculator tools, submit project requests, or subscribe to our newsletter.

We are committed to respecting and protecting the privacy of the individuals whose personal data we process. All your personal data will be processed in accordance with applicable data protection laws, including the European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the **"General Data protection Regulation"** or **"GDPR"**), as amended from time to time.

This Privacy Notice applies together with our Cookies Statement, which is available at our website.

## 2. The controller of your data

Esdec Solar Group is a global supplier of innovative mounting systems with its headquarters in the Netherlands. The parties generally responsible for processing your personal data (in this notice referred to as **"we"** and/or **"us"**) are:

Esdec B.V.  
Londenstraat 16  
7418 EE Deventer  
The Netherlands  
Telephone: +31 850 702 000  
Email: info@esdec.com

BluBase B.V.  
Lingenstraat 9  
8028 PM Zwolle  
The Netherlands  
Telephone: +31 858 000 501  
Email: info@blubase.com

However, where products or services are provided to you by other entities within the Esdec Solar Group, the entity providing the products or service will be responsible for your personal data. This notice applies to all entities established in the European Economic Area.

## 3. What data do we collect about you?

When you use our online services, contact us, place an order, use our online calculator tools, submit project requests, or subscribe to our newsletter, we may collect the following data about you:

- Your domain name, IP address, and/or anonymized user identifier
- Which internet browser you are using
- The device and/or environment you are using
- The origin of your visit to our website (such as through a Google search result, through our Facebook page, etc.)
- Your surfing behavior and activity on our online services (such as what you look at on the website, what you click, how much time you spend on the website, etc.)
- Your viewing of our online advertisements
- Your user experience with our online services
- Your full name
- Your address
- Your email address
- Your company
- Your telephone number
- Your order history and payment details

- How often you open our newsletter and whether you click on buttons and links to our website
- Your requests
- Your entries into promotions, contests, or surveys
- Any additional information that you directly provide to us (such as emails, phone calls, letters, online contact form information, personal information, etc.)

Our online services intend to provide information and to collect information only from those over the age of 18. People under the age of 18 are prohibited to provide any information on or through our online services. If we learn that we have collected or received personal information from a child under the age of 18, without verified parental consent, we will delete the information collected immediately after becoming aware of such fact. We do not knowingly solicit or collect personal information from or about children under the age of 18, and we do not knowingly market our products or services to children under the age of 18.

#### **4. How do we collect your personal data?**

The way we collect your personal data depends on how you use our online services, contact us, place an order, use our online calculator tools, submit project requests, or subscribe to our newsletter. Some data is collected automatically as you interact with our online services. Other data is collected directly from you (such as information you provide for a specific purpose, request, etc.) or with your consent. Where required by law, we will obtain your consent for the collection and processing of your information (such as for the purpose of direct marketing). An overview of all possible ways in which we can collect your data is listed below:

- When you visit our website and accept cookies
- When you create an account with us (such as for online tools etc.)
- When you subscribe to our newsletter
- When you contact us (such as via telephone, an online contact form, email, postal mail etc.)
- When you place an order, use our online calculator tools, or submit project requests
- When you input your data or information into an online tool or form

Our online services may automatically record certain information through the use of cookies. Please refer to our separate Cookies Statement for more information.

#### **5. Why do we collect these data?**

It is necessary for us to collect certain data for various purposes. For example, we cannot contact you unless we have your email address, name, or telephone number, and we need an address to which products can be shipped. In addition, we also collect certain data for marketing purposes, for example, your email address when you subscribe to our newsletter.

An overview of possible reasons why we collect your data is listed below:

- To provide the products and services you request (such as quotations, recommended layouts, product samples, product literature, offers, calculation using online tools, project requests, our newsletter, etc.)
- To process orders and ship products
- To be able to contact you, for example, about orders or to answer questions when you have contacted us
- To manage your accounts and provide you with support/customer service
- To assess our existing or potential business relationship
- To enforce our terms and conditions
- To conduct sales and marketing activities, including, but not limited to, pursuing marketing prospects, conducting market research, evaluating our advertising effectiveness and managing our brand
- To manage our business
- To evaluate, operate and improve our business by enhancing our products and services, through the development of new products and services, managing the relationships with our customers, performing billing, accounting, auditing, reconciliation and collection activities
- To provide you with the best and most personal customer experience
- To improve your surfing and experience of our online services

The legal basis of the data processing activities carried out by us depends on the type of data we are processing as well as the purpose of the processing. The legal basis of the processing could include the following:

- **Performance of our contract:** we are allowed to process your personal data to (i) communicate with you before entering into our business relationship, and/or (ii) deliver our products and services and to fulfil a contract with you. For example, we need your contact details to process your orders and ship the requested products.
- **Legitimate interest:** we may process your personal data when it is in our legitimate interest to do so. For instance, we may collect certain data from our website to improve our online services and the look and feel of our website.
- **Consent:** we may also process your personal data if we have your express consent, e.g. when you sign up for our newsletter.
- **Legal obligation:** we may process your personal data to comply with our legal and regulatory obligations, such as tax laws.

## 6. How long do we store these data?

We store your data only for as long as is necessary for the purposes mentioned in this Privacy Notice in accordance with reasonable business practices and applicable laws, or if we are required by mandatory laws to retain the data. For example, if you unsubscribe from our newsletter, we no longer need your email address for purposes of the newsletter and your data will be removed from our mailing list. We will not store your data if we are required by law to delete it (e.g. if you object to the processing and we do not have compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms).

## 7. How do we protect your data?

We take appropriate security measures (such as physical, electronic, and administrative safeguards) to protect any data we collect from unauthorized or inappropriate access. We restrict access to information about you to those workers who need to know the information in order to achieve the purposes mentioned in this Privacy Notice.

## 8. What are your rights under data protection laws?

Subject to specific legal requirements and potential restrictions, you may have the following rights under applicable data protection laws:

- You have the right to obtain information on your data stored by us, as well as on certain aspects of our data processing activities, including the purposes of processing and the recipients of your data.
- At your request, we will correct the inaccurate or incomplete data stored by us in relation to you.
- You have the right to request the deletion of your data, if doing so is not in conflict with other statutory provisions (e.g. statutory retention periods) or an overriding interest on our part (e.g. for the defence of our rights and claims).
- You have the right to request that we restrict the processing of your data. In such cases, we may only use the data for certain limited purposes set out by the law.
- You have the right at any time to object to any processing of your data that is based on our legitimate interests or public interest on grounds relating to your particular situation. If you object, we will no longer process your personal data unless we can prove compelling legitimate reasons for the processing that outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.
- In case we process your personal data for direct marketing purposes, and you do not wish to receive advertising, you have the right to object to this at any time. If we receive such objection from you, we will stop processing your data for direct marketing purposes.
- In certain cases, you also have the right to receive your data in a structured, commonly used and machine-readable format or have it sent to a third party.
- In addition, you have the right to revoke any consent given to us for the processing of personal data with future effect at any time. Please note that if you withdraw your consent, that does not make the data processing carried out by us prior to receiving your request unlawful.
- You also have a right to complain to a data protection supervisory authority. However, we recommend that you always direct any complaints to us first. You may lodge a complaint with the supervisory authority located, for example, in the country of your habitual residence or place of

work. A list of supervisory authorities in the EU can be found [here](#).

If you want to exercise any of the above rights, or if you have any questions in relation to our data processing activities, you may submit a request to us via email or phone call:

- Email us at [data@esdecsolargroup.com](mailto:data@esdecsolargroup.com)
- Call us at +31 85 070 2000

## 9. How is your data shared?

Generally, we will not share any data we collect with third parties and affiliates except as outlined below. For example, we may share your data with authorized business or support partners or third-party service providers that, on our behalf, perform certain services, such as processing credit card payments, providing customer support and marketing assistance, performing sales analysis, supporting the functionality of our website, fulfilling your requests, management of contests, promotions and surveys, facilitating payroll, and communicating our newsletter. These third parties will have access to your information to the extent needed in order to perform their services, but the third parties are not permitted to share or use your information for any purposes besides those outlined in this Privacy Notice. We will never sell your data to a third party for the third party's marketing use.

Additionally, we may disclose personal information about you:

- If it is necessary to a transaction or request you have made
- If we are required to do so by law or court order
- If we must comply with a legitimate legal request by a legal authority or government official
- If we believe we must do so in order to prevent financial loss or physical harm
- To establish or defend our legal rights or defend against legal claims
- In connection with fraud or illegal activity, suspected or actual

Our website may contain links to third party websites, such as websites of authorized distributors, sales affiliates, third party service providers, etc. We do not control the content, security, or privacy practices on these sites, and we encourage you to review the privacy notices of each site you visit.

We may use plugins, such as social share buttons or a like button (for example, for social media websites such as Facebook, etc.). Plugins, including their loading, use, and operation, are governed by the third party's privacy notice.

Please note that where it is necessary to transfer your data to a recipient outside of the European Union (EU) and the European Economic Area (EEA), we will comply with all transfer requirements applicable under data protection laws. You may request a copy of the arrangements we have implemented with recipients located outside the EU and the EEA by contacting us via email ([data@esdecsolargroup.com](mailto:data@esdecsolargroup.com)) or phone (+31 85 070 2000).

## 10. Does this Privacy Notice ever change?

We reserve the right to modify or supplement this Privacy Notice. Please revisit this Privacy Notice periodically to ensure that you have up-to-date information concerning our data processing activities. The date of the latest version of this Privacy Notice is indicated below.

Last updated: 1 September 2022