

Privacy policy

1. General

1. When you browse the website www.stuv.com (hereinafter referred to as "the Website"), STUV SA, whose registered office is at Rue Jules Borbouse 4 5170 Bois-de-Villers, Belgium, registered with the BCE under no. 0423 958 29 (hereinafter referred to as "STUV"), collects and processes personal data belonging to the user (hereinafter referred to as "the User"). STUV processes personal data pursuant to and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "GDPR") and the law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

By personal data, this Privacy Policy means any information relating to an identified or identifiable natural person; 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.

STUV attaches a great deal of importance to protecting Users' privacy and personal data. STUV would like to inform Users of any processing of their personal data and their associated rights.

2. The department responsible for processing data for the website www.stuv.com is

Stûv SA, Rue Jules Borbouse 4, 5170 Bois-de-Villers (VAT-BE): VAT BE 0423 958 29

The data controller can be contacted via the following channels: dataprivacy@stuv.com

2. Processing Users' personal data

1. In accordance with the GDPR, the purpose of this Privacy Policy is to explain:
 - The processing of personal data required for the purposes of fulfilling the contractual relationship between STUV and the User, which are specified in article 3 of the Privacy Policy (clients, resellers, suppliers);
 - The processing of personal data based on STUV's legitimate interests (defined in article 4 of the Privacy Policy);
 - The processing of personal data subject to the free, explicit prior consent of Users of the purposes explained in article 5.

The User guarantees that the data and information communicated to STUV is accurate.

2. STUV processes personal data legally, honestly and transparently in relation to the User in question. Personal data is collected for specific, explicit, legitimate reasons, and is under no circumstances processed subsequently in any way that is not compatible with these purposes.

STUV processes personal data in a way that is adequate, relevant and limited to what is required in terms of the purposes for which it is processed.

STUV undertakes to ensure that the data processed is accurate and, if necessary, kept up-to-date. All reasonable measures are taken to make sure that personal data that is inaccurate, in relation to the purposes for which it is processed, is deleted or corrected without delay.

3. The processing needed for the fulfilment of the contractual relationship between STUV and the User

1. STUV processes the following personal data for the purposes described below. This processing of personal data carried out by STUV does not require the consent of Users by virtue of article 6.1.f), 9.2, f) and 10 of the GDPR.
2. The following personal data is processed:
 - The details needed to sign in to the Website such as surnames, first names, date of birth, language, postal address, password, email address, username, website and contact details of the User;
 - Documents, material, emails, letters etc. sent by the User to STUV within the context of the fulfilment of the contract between STUV and the User;
 - Information that may be exchanged between STUV and the User, including in particular by email via the Website;
 - Information relating to browsing the Website and the content accessed by the User;
3. Processing involves collecting, saving, keeping, consulting, organising, using and collating the personal data described in article 3.2.
4. STUV processes the personal data described in article 3.2 for the following purposes:
 - Managing User registration and accounts (reseller, partner and client accounts);
 - To define Users' needs and provide high quality services for which they would like to use STUV.

4. Processing based on STUV's legitimate interests.

1. STUV has **a legitimate interest** as defined by 6 f) of the GDPR in processing the User's personal data for the following purposes:
 - For STUV to inform the User of the services it offers;
 - Advertising and marketing, including sending hard copy or electronic newsletters for STUV or its partners;
 - For statistical surveys, customer satisfaction and market research;

- Invitations to events organised or sponsored by STUV (talks, drinks parties, cultural events etc.).

These legitimate interests are automatically logged in the register described in article 6.1.

2. The following personal data is processed:

- Users' surname and first name, their email address or postal address;
- Users' opinion on the services provided.

3. Processing involves consulting, organising, using and collating the personal data described in article 4.2.

4. The purpose of the processing is STUV's legitimate interest in:

- promoting the services that it offers Users;
- understanding how happy Users are with a view to improving its services.

5. STUV processes personal data as follows:

- Collecting personal data for statistical purposes relating to use of the Website (number of visits, signing up etc.).
- Analysis tools allow STUV to make sure the design of the Website meets the Users' expectations, as well as to continue to optimise how it works. STUV also uses monitoring measurements to gather statistics about how web pages are used in order to optimise the services offered to Users by STUV.

GoogleAnalytics: <https://policies.google.com/privacy?hl=en>

- Advertising tools are used to display relevant advertisements related to STUV products on our partners' websites or social media accounts.

STUV uses the following advertising tools:

GoogleRemarketing: <https://policies.google.com/technologies/ads?hl=en>

Facebook pixel: <https://www.facebook.com/policy.php>

Instagram: <https://help.instagram.com/402411646841720>

- STUV also uses GoogleMaps to display a map showing the nearest outlets to a postcode provided by the User as a search criterion.
- Social media plugins are used on the Website so that Users can share content on social media. These plugins currently include Youtube, Facebook, Instagram and Pinterest services. Vis these plugins, information including personal data may be passed on to these suppliers and used by them.

For more information, please visit:

- Facebook: <https://www.facebook.com/policies>
- Instagram: <https://help.instagram.com/402411646841720>
- Pinterest: <https://about.pinterest.com/en/privacy-policy>
- Youtube: <https://policies.google.com/privacy?hl=en>

STUV is in no way responsible for any subsequent processing by these suppliers of the data provided.

5. The processing of personal data with the Users' consent

- 5.1. By accessing the Website, Users have expressed **their free, specific, informed and unequivocal desire** to specifically authorise STUV to process their personal data as described in articles 2 to 4 of this Privacy Policy, in accordance with the GDPR and the law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data as well as within the limits defined by this Privacy Policy.

Users have the right to withdraw their consent at any time by contacting the data controller as detailed in article 1.2.

2. By sending any request or enquiry via the online contact form, Users agree to STUV processing the personal data they have provided so that it can respond to their enquiry and any subsequent enquiry.

For any kind of enquiry, Users are explicitly asked to give their consent to the processing of personal data. STUV can only process this data with the User's explicit prior consent.

List of enquiries:

- Sending a catalogue by post
- Downloading the product book (prescriptive guide)
- Downloading the 3D model file of a product
- Sending the list of nearby resellers by email
- Sending the recommended retail price list by email
- Requesting information from your regional resellers
- Requesting quotes from your regional resellers
- Question or request for a meeting with the reseller of your choice
- Question for the manufacturer
- Request for information as a potential Stûv supporter/partner/reseller
- Signing up for the newsletter: periodic email containing news, usage tips, product choices, special offers and commercial campaigns (max. 4 per year)
- Registering your device to benefit from the extended guarantee or proof of your statutory guarantee

By sending an enquiry via the contact form, Users are informed and give their consent that certain enquiries are passed on to STUV's partners, such as resellers/installers, or the importer responsible for the User's home country, so that these partners can process the enquiry. In these circumstances, these partners receive the data provided in the online form. If the data is shared with partners, the online form will inform the User that the enquiry may be subcontracted out to partners. The User's prior consent is required for STUV to be able to process the enquiry. Users explicitly accept that STUV and/or its partners can contact them via email within the context of their enquiry.

The data provided will be kept until the User asks for it to be deleted or withdraws consent in accordance with the procedure described in article 1.2.

3. As explained in article 11 of the Privacy policy, STUV uses cookies to make sure the Website works properly, improve Users' browsing experiences, analyse usage and adapt the content to their areas of interest. By accessing and using the Website, Users agree to accept cookies on their computer. Cookies help to optimise browsing on the Website, as explained in article 11 of the Privacy Policy. Users can block cookies by changing their browser settings. The process is different for each browser (Internet Explorer, Google Chrome,

Mozilla Firefox, Apple Safari etc.), and Users can find instructions in their browser's "Help" menu. Users acknowledge that disabling cookies will change the way the Website works.

4. If STUV plans to use Users' personal data for purposes other than those described in articles 3 to 5 of this Privacy Policy, it will inform them comprehensively and accurately, and obtain their free, specific, informed and unequivocal consent to explicitly authorise STUV to process their personal data in accordance with the GDPR, within the limits defined below.

6. Obligation to keep a record

1. As a data controller, STUV must keep **a record** of the processing activities over which it has control and is its responsibility at all times.
2. This **record** contains the following information:
 - a description of the purposes of the processing;
 - a description of the categories of people involved and categories of personal data;
 - the categories of recipients to whom the personal data has been or will be sent, including recipients in third-party countries or international organisations;
 - the timescales anticipated for deleting different categories of data;
 - a general description of technical security measures.

7. Keeping data and for how long

1. STUV keeps Users' personal data in a form that can identify them and in accordance with appropriate, secure methods.
2. Users' personal data is kept no longer than required for the purposes for which it is processed.

2. Information, Right to access, correct and object

1. When personal data about the User is collected from them, STUV will provide all of the following information at the time that the data is obtained:
 - the identity and contact details of the data controller
 - the contact details of the data controller;
 - the purposes for which the personal data is intended as well as the legal basis for the processing;
 - the recipients or categories of recipients of person data, if there are any.
2. Users can request all the information detailed in article 8.1 at any time, according to the process described in article 1.2; STUV will respond to this information request **within the month**, apart from in any particular circumstances.
3. Users whose data has been collected can ask STUV if they can access their information kept by STUV at any time and at no cost. They can ask for their details to be updated or corrected if they are incorrect or incomplete, or for personal data to be deleted (right to be forgotten) as quickly as possible. If possible, STUV will provide notification of the above for the User in question.

4. Users have the right to obtain a copy of their personal data that is being processed. STUV can demand payment for reasonable costs based on administrative costs for any additional copy requested.
5. Users can have the processing of their personal data limited when:
 - the data is incorrect;
 - the processing is deemed to be illegal;
 - STUV no longer needs the data for the purposes of the processing.
6. Users can object to the processing of their personal data or object to any automated processing of their data, such as profiling, by demonstrating reasonable grounds, as long as this does not make it harder for STUV to fulfil its obligations or if it is against its legitimate interests.
7. In any circumstances and at any time, Users can object to the processing of their personal data by STUV for marketing purposes, including in the future.
8. Users are entitled to obtain the personal data they have given to STUV in a structured format. This format must be commonly used and machine readable. Users also have the right to pass on this data to another data controller without STUV putting any obstacles in place.
9. Users can exercise the rights described in articles 8.1 to 8.8 by contacting STUV using the contact details provided in article 1.2.

9. STUV's responsibility – Data processors

- 9.1. STUV guarantees that the processing of the User's personal data is legal, proportionate and in accordance with the requirements of the GDPR and applicable Belgian legislation.
- 9.2. STUV has taken all appropriate technical and organisational measures to make sure that the processing of personal data complies with the GDPR. These measures include, among other things, the pseudonymisation and limitation of the data. These means that only the data needed for the purpose required is processed by STUV.
- 9.3. STUV makes sure that when the processing is carried out by a data processor, the latter offers adequate guarantees about the implementation of appropriate technical and organisational measures so that the processing responds to the requirements of the GDPR and guarantees protection for the User in question. The processing carried out by a data processor complies with the requirements detailed in article 28 of the GDPR.

10. Security and confidentiality

- 10.1. STUV takes all reasonable measures to ensure the confidentiality and security of the personal data that it processes. To this end, the Website uses a TLS security protocol (Transport Layer Security), which can be identified by the URL address beginning with https:// and the padlock icon displayed by the browser.
- 10.2. The data is processed in such a way as to guarantee appropriate security for the personal data, including protection against unauthorised or illegal processing and against loss, destruction or accidental damage, thank to appropriate technical or organisational measures.

- 10.3. If applicable, with the help of the data controller, STUV will carry out an impact analysis if processing might cause a high risk for the User.

The data will not be passed on to third parties other than STUV's partners, unless:

- It is required for the fulfilment of the contractual relationship between STUV and the User;
- The User has given consent for this transfer;
- If this transfer is required by law, or any judicial or administrative authority.

- 10.4. STUV undertakes to make sure that if there is a security problem connected to the data being processed, it will report the incident to the Data Protection Authority as quickly as possible. STUV will also inform the Users affected.

Users are informed and give their consent for the personal data collected to be passed on to STUV's partners and suppliers, including in particular if Users choose to use the services of these partners from the Website.

The partner will be regarded as a data processor ("sous-traitant") as defined by the law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data or the GDPR. STUV does not accept any responsibility for the processing of Users' personal data by the partner, which offers its own services in its own name on its own behalf.

- 10.5. Lastly, Users confirm that they have been informed and give their consent for these third-party companies to process certain data occasionally for any necessary technical services designed to make sure the Website is working properly and up-to-date, as well as other media, networks or information tools used by STUV.

11. Browsing and the use of Cookies

1. General

STUV uses cookies to make sure the Website works properly, improve Users' browsing experiences, analyse usage and adapt the content to their areas of interest. Cookies are small text files stored on your computer (PC, laptop, tablet or Smartphone), saved by your browser. They do not cause any damage to your device and do not contain any viruses.

2. Reasons for using Cookies

2.1. Anonymous audience analysis cookies

These cookies are essential for the correct operation of the Website and are automatically enabled. They help to draw up anonymous statistics about how the Website is used. These cookies stay on your computer until you delete them.

2.2. Non-anonymous audience analysis cookies

Thanks to the use of cookies, STUV collects and analyses personalised browsing data (in other words, related to the User's IP address). These cookies allow STUV to recognise the browser at the time of the next visit. STUV uses these cookies to save preferences, such as language preferences for example, and apply them to subsequent sessions). Users can disable these cookies at any time, but the Website will not be as pleasant to use.

2.3. Cookies for customising offers

Thanks to these cookies, STUV can optimise browsing by displaying relevant information connected to the User's interests on the Website. These cookies stay

on the User's computer until they are deleted by the User. Users can disable these cookies at any time, but the Website will not be as pleasant to use.

2.4. Cookies for targeted advertising

These cookies are used to display relevant advertisements related to STUV products on our partners' websites or social media accounts. These cookies stay on the User's computer until they are deleted by the User. The User can disable cookies at any time.

- Remarketing with Google Analytics

The Website also uses the remarketing functions offered by Google Analytics in connection with the display features on all devices for Google AdWords and Google DoubleClick.

More information, as well as provisions relating to data protection in Google's privacy policy, can be found at: <https://policies.google.com/technologies/ads?hl=fr>

- Pixel Facebook

To measure Users' conversions and actions, the Website uses Facebook Pixel. You can find more information about privacy protection in the information provided about data protection by Facebook: <https://www.facebook.com/about/privacy/>

12. Data Protection Authority

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data, Users have the right to request additional information from or submit a complaint to the Data Protection Authority.

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