

1. Introduction

Frubero BV and its registered brand Frutastic values your privacy and are committed to protecting your personal data in accordance with applicable privacy laws.

This privacy notice explains how we collect and use your personal data. Personal data means any information relating to an identified or identifiable natural person; one who can be identified, directly or indirectly, by reference to an identifier such as 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.

This privacy notice applies to all our (current, former) customers, suppliers, to all visitors of the website, and to all other persons who contact us. This privacy notice applies to the processing of your personal data following the use of this website and the services that we provide.

We may amend this privacy notice at any time for example if circumstances change (amendments to our services, legislation, etc.). You are advised to regularly consult this privacy notice. In case of substantial change to this privacy notice, we shall also actively inform you by way of an announcement on our website.

By accessing and using our Wix website and Shopify webshop, you confirm that you have read and that you understand the way we collect, process, use and disclose your Personal Data as described in this Privacy Policy.

2. Data controller

Data controller means the company which, along or jointly with others, determines the purposes and means of the processing of personal data. In general, this will be the company which you have a (contractual, commercial or other) relationship with. For instance, if you are a customer or supplier, the data controller is the group company identified below with whom you have a contractual relationship or with whom you communicate.

Frubero BV is to be considered as the data controller regarding our website.

Frubero BV
Company number: 0723.645.437
Heerweg 21
8560 Moorsele (Wevelgem)
Belgium
VAT BE 0723.645.437

3. Categories of Personal Data Collected

Information you provide

We collect personal data in a variety of ways through our normal business activities both online

and offline. This includes, for example when you place orders or purchase products, enter into agreements or communicate with us, or visit and use websites.

The categories of personal data we may collect and process includes:

- **contact information** that allows us to communicate with you, such as your name, date of birth and prefix, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and registration information you provide on our website;
- **relationship information** that helps us do business with you, such as the types of products that may interest you, contact and product preferences, languages, marketing preferences;
- **transactional information** about how you interact with us, including purchases, inquiries, customer account information, order and contract information, delivery details, billing and financial data, details for taxes, transaction and correspondence history, and information about how you use and interact with our websites; and
- **security and compliance Information** that helps us to secure our interests, fraud prevention and internal verification,

When we ask you to provide your personal data in order to give you access to one of the functions of our website or shopify webshop, please note that certain fields may be marked as mandatory. If you choose not to provide us with this data, you may not be able to use these functions.

Information we collect indirectly (cookies):

Subject to your consent where required by law, we and our third-party service providers may use a variety of technologies that collect and provide information about how the Website is accessed and used. Such Information may consist of your internet browser type, operating system, service provider, the webpages you viewed, the time you viewed them and for how long, demographic information about you (such as your age, gender, language, location and interest areas, where available) and what webpages you looked at before viewing the current page. We use this information to get a better idea of how our users interact with our website and then tailor and improve our website accordingly. Such information generally cannot be linked to you individually, but if we can link it to you then we treat it as your personal data in accordance with this Privacy Policy.

Certain information is gathered by means of cookies. Cookies and similar technologies are used on this website as described in our Cookies

4. Purposes of Processing

We may use your personal data for the following purposes:

- website improvement: maintaining, customizing and improving the Website;
- managing our relationship: managing our ongoing relationship with you, including interacting with you, fulfilling your orders and requests, including complaints and disputes and providing other services related to your requests;
- (direct) marketing: (tailored) promotional offers and information regarding our products and services;

- business needs: managing our business needs, such as payment processing and account management, product development, contract management, corporate governance, audit, and legal compliance;
- compliance with legal and/or regulatory obligations;

This paragraph has been included to inform you regarding the purposes of the processing of your personal data. If we collect or process your personal data for other purposes, we shall inform you on a case-by-case basis in line with applicable law.

5. Legal ground

We may collect and process your personal data based on the following legal grounds:

- in specific circumstances, the processing of Personal Data can be based on your freely given consent, in particular with respect to cookie usage (see our cookie policy, our newsletter);
- the processing of Personal Data is necessary for the performance of the contract - or to take steps prior to entering into a contract - between Frubero and you : e.g., when you place an order on our website;
- the processing of Personal Data is necessary for the purposes of the legitimate interests pursued by Frubero or by a third party and those interests are not overridden by the Data Subject's interests and fundamental rights and freedoms. Such legitimate interests include the improvement or further development of our business operations in general,
- the processing of Personal Data is necessary for compliance with a legal obligation to which Frubero BV is subject, in particular tax obligations.

This paragraph has been included to inform you regarding the legal grounds for the processing of your personal data. If we collect or process your personal data on the basis of other legal grounds, we shall inform you on a case-by-case basis in line with applicable law.

6. Data sharing

In connection with the purposes described above in Section 5 and in compliance with applicable law, we may need to share your personal data with third parties, so-called 'recipients' such as:

- third party service providers and suppliers (processors): we may use third parties to provide or perform services and functions on our behalf. We may make personal data available to these third parties, to perform these services and functions. Any processing of that personal data will be on our instructions and compatible with the original purposes;
- public and judicial authorities: we may also make personal data concerning individuals available to public or judicial authorities, law enforcement personnel and agencies as required by law, including to meet national security or law enforcement requirements, and including to agencies and courts in the countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise or defense of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of

others, or as needed to support external audit, compliance and corporate governance functions;

- third party acquirers in the context of mergers & acquisitions: personal data may be transferred to a party acquiring all or part of the equity or assets or our business operations in the event of a sale, merger, liquidation, dissolution, or other;
- affiliates and/or subsidiaries: we may also transfer and share personal data to our affiliates/ and/or subsidiaries in compliance with applicable law.

7. Retention

Your personal data will not be retained for any period longer than is necessary for us to achieve the purposes for which it was collected as identified herein, which will generally be for up to **ten years following the end of our contractual relationship with you**, unless shorter or longer retention periods apply under applicable law. The retention period may therefore differ depending on the objective.

8. Security

We apply appropriate technical, physical and organizational measures that are designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful forms of processing. Access to personal data is restricted to authorized recipients on a need-to know basis.

9. Data subject rights

The rights described here below may be exercised in accordance with the regulations and restrictions provided for in law.

Subject to the conditions set forth under applicable law, You have the right to (i) obtain confirmation about whether or not personal data is being processed and, if so, obtain access to their personal data and information regarding the processing as well as a copy of personal data undergoing processing; (ii) to correct incorrect personal data, complete personal data including by means of providing a supplementary statement; (iii) to object to the processing, including profiling, of personal data based on certain grounds and the right to object at any time to the use of personal data for direct marketing purposes, including profiling related thereto; (v) in case of the provision of consent to the processing of personal data, the right to withdraw consent at any time, without such withdrawal affecting the lawfulness of processing based on consent before its withdrawal.

Subject to certain conditions as set forth under applicable law, you also have the right to (i) have personal data erased; (ii) the right to obtain restriction of the processing of personal data, and in case of restriction; have the processing limited to mere storage; (iii) receive your personal data that you have provided us in a structured, commonly used and machine-readable format and request that we transmit your personal data to another controller (portability right).

Please note that the above rights are not absolute and may be subject to restrictions/conditions under applicable law.

Please note that we do not use automated individual decision-making, including profiling.

10. Contact or complaint

If you have any questions about the use of your personal data related this privacy notice or want to exercise one of your rights, you can contact us at info@frubero.be

You also have the right to submit a complaint to the supervisory authority.

The lead supervisory authority is the Belgian Data Protection Authority (APD/GBA).

Website:

<https://www.gegevensbeschermingsautoriteit.be>

Contact details:

Data Protection Authority

Drukpersstraat 35, 1000 Brussels, Belgium

+32 (0)2 274 48 00

+32 (0)2 274 48 35

contact@apd-gba.be

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