



Privacy Policy M-LOCKS B.V.

For the purposes of applicable data protection and privacy laws, M-LOCKS B.V. ("M-Locks", "us", "we"), with its registered offices at Vlijtstraat 40, 7005 BN Doetinchem, Netherlands, is considered the "Data Controller" in respect of the Personal Data that it collects, uses and manages in accordance with this Privacy Policy ("Policy").

Protecting your privacy is important to M-LOCKS. We are committed to protecting all Personal Data provided to M-LOCKS, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. Personal Data is information which relates to an identified or identifiable living individual.

This Policy explains what Personal Data we collect, how we may use and manage it and the rights you have in relation to your Personal Data. Before you provide us with any Personal Data or browse our website, you should read through this Policy in full and make sure that you are comfortable with our privacy practices.

Please note that our website may contain links to other websites. These third party sites are not subject to this Policy and we recommend that you check the privacy and security policies of each website that you visit. We are only responsible for the privacy and security of the data that we collect and have no control over the actions of any third parties in relation to your data.

Please refer to the Glossary below for an explanation of the defined terms in this Policy.

Whose Personal Data do we collect?

M-LOCKS collects Personal Data from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers and other business contacts;
- users of our website;
- individuals who contact us by any means; and
- employees and job applicants.

How we collect your Personal Data?

We obtain Personal Data which you knowingly and voluntarily disclose to us, both in an online and offline context. We collect Personal Data when you:

- visit our website and / or complete one of our web forms;
- contact our company or request information from us in any other way;
- visit our company;
- submit an order to us;
- communicate with us via social networking websites, third party apps or similar technologies;
- subscribe to our blog, newsletters, emails; and
- visit one of our trade counters at an exhibition.

We may also collect information received by us from third party sources, for example relating to your use of other websites which we operate.

What Personal Data we collect?

M-LOCKS may collect a range of Personal Data from you in a business context, such as your name, gender, job title, photographic identification, email address, home address and other contact details, details of your business and other interests, communications with you (including notes from meetings



and visit reports), M-LOCKS products or services that we have provided you with or that you might have an interest in and financial and payment information.

When you use our website, we collect certain standard information that is sent by your browser to our website. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times, country and any referring website addresses.

The purposes for which we process your Personal Data

We process your Personal Data for the following purposes:

- to provide you with information, products and services ordered by you;
- to notify you of any changes to your services and to provide you with information in relation to similar goods and services that may be of interest;
- to provide you with information about our market environment, events, product launches;
- to communicate with you and third party contacts;
- to administer our website and help improve our products and services;
- to carry out analytics in relation to the use of our website;
- to comply with applicable laws and regulations; and
- other business-related purposes, including negotiating, concluding and performing contracts, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration.

Recruitment

When you apply for a job via our website or otherwise, we will collect additional more specific Personal Data about you, such as your qualifications, career history, third party references and interview notes. We may also ask you for other information, for example your interests and the types of jobs you are interested in. Any Personal Data you provide to M-LOCKS in relation to a job vacancy will be processed in accordance with our privacy policy.

The legal basis for M-LOCKS processing your Personal Data

In order to comply with applicable data privacy laws, M-LOCKS is required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for M-LOCKS processing your Personal Data will be one of the following:

- your consent;
- the performance of a contract that we have with you or other individuals;
- M-LOCKS or our third parties' legitimate business interests; or
- compliance with our legal obligations.

Who we share your Personal Data with?

M-LOCKS may share your Personal Data with people within the company who have a "need to know" that data for business or legal reasons, for example, in order to carry out an administrative function



such as processing an invoice, or to direct a query that you have submitted to the relevant department within M-LOCKS.

We will not disclose any (personal) data to third parties unless it is strictly necessary due to the execution of any agreement or to meet a legal obligation.

We may decide to allow users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Security

M-LOCKS takes all reasonable technical and organizational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss and unauthorized access, destruction, misuse, modification or disclosure.

Records retention

Your Personal Data is not kept longer than is necessary for the purposes for which it is collected. This means that data and records (including Personal Data) are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal Data they contain.

Your rights

Applicable data privacy laws give rights to individuals in respect of Personal Data that organizations hold about them. If you wish to:

- request a copy of the Personal Data that we hold about you; or
- request that we rectify, delete, or limit the processing of your Personal Data,

please submit your written request to M-LOCKS B.V. via info@m-locks.com.

Questions and complaints

If you have a concern or complaint about how M-LOCKS has used your Personal Data, as a first step, you should raise this in writing with M-LOCKS, using the contact details available on our website at <https://www.m-locks.com/contact/> or via info@m-locks.com.

If you are not satisfied with the handling of your concern or complaint by M-LOCKS, you can escalate this to your national Data Protection Authority.

Changes to this Policy

We reserve the right to modify or amend this Policy at any time by posting the revised Policy on our website. It is your responsibility to review the Policy every time you submit information to us or place an order.

Cookies

A cookie is a small data file that a website may write to your hard drive when you visit. A cookie file can contain information (such as an user ID) that the website can use to track the pages you have visited and your preferences. The only Personal Data a cookie can contain is information you personally supply. A cookie cannot read data from your hard disk or read cookie files created by other websites.

M-LOCKS uses cookies to track user traffic patterns and to provide a better service for users when they visit the website.

Users can set their browsers to provide notification when a cookie is received. Users can also refuse all cookies by turning the function off in their browsers. However, to ensure the full functionality of the M-LOCKS website, the use of cookies is required.

Social media features

On the M-LOCKS website social media features, such as sharing or following buttons are included. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly.

Social media features are either hosted by a third party or hosted directly on our websites. This Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

Your feedback

We think it is very important to hear what you have to say about our policies. If you have any feedback about this Policy, please e-mail us via info@m-locks.com.

Glossary

Data Controller	A party that determines the purposes and means of data processing.
Data Protection Authority	The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of M-LOCKS B.V.
Personal Data	Information which relates to an identified or identifiable individual (i.e. data about M-LOCKS employees, applicants, employees of vendors and suppliers, customers business relations and individuals who use our website). It includes names, addresses, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.
Processing	<i>Doing anything</i> with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.