

## PRIVACY STATEMENT BTE GROUP

### Scope

The privacy statement applies to the processing of personal data by companies from the BTE Group insofar as it concerns the data of persons working at/for (a company of) the BTE Group. A separate privacy statement applies to the last group.

### The BTE Group

Within the BTE Group, personal data are currently processed by the following group of affiliated companies located in the Netherlands:

Name	Place	Ch. of comm.
BTE Holding B.V.	Dodewaard	37068276
BTE Nederland B.V.	Dodewaard	11005817
BTE Duitsland B.V.	Dodewaard	20082914
ASCEM B.V.	Rheden	14076258
De Metoor Beton B.V.	Rheden	09008745
De Hamer Beton B.V.	Nijmegen	10007379
Romein Beton B.V.	Dodewaard	11009063
Lodewikus Beton B.V.	Oosterhout	20047973
Nehobo Beton & Staal B.V.	Bunschoten-Spakenburg	24247965
Prefab Beton Vebo B.V.	Bunschoten-Spakenburg	31027606
Vebo Staal B.V.	Bunschoten-Spakenburg	31038776
Kemper Beton B.V.	Tilburg	18012626
Steenhuis Beton B.V.	Uithuizermeeden	02040516
Hercules Beton B.V.	Tienray	12053994

Any future group companies that process personal data are also included in the BTE Group within the meaning of this privacy statement, unless otherwise stipulated.

The various companies in the BTE Group all apply the same privacy policy. Personal data can be exchanged within the BTE Group for the purposes further specified in this privacy statement.

The formal responsibility for the processing of personal data within the BTE Group lies with BTE Holding B.V.

For the sake of readability, hereafter in this privacy statement reference is simply made to 'BTE', 'we' or 'us' to refer to one or more companies in the BTE Group.

### Processing of personal data by BTE

The protection of personal data is very important to BTE. BTE respects your privacy and ensures that your personal data is always treated confidentially and in accordance with applicable privacy legislation.



### **Purposes of the processing**

BTE processes your personal data for the following purposes:

1. To take pre-contractual measures (such as the preparation of tenders) and the execution of the agreement(s) concluded with you.
2. To be able to contact you, to respond to questions you have asked of or comments you have placed.
3. To carry out marketing activities, including providing information about new products and/or services and offers from BTE (including via the newsletter), organising events/meetings and other marketing activities.
4. To improve the website and BTE services.
5. To conduct the administration, as well as other activities of internal management, including conducting security generating statistics.
6. To calculate, register and collect amounts due, including the placing of claims in the hands of third parties (debt collection agencies etc).
7. To deal with disputes and perform auditing.
8. To comply with legal obligations such as the administration and retention obligation.

### **Legal basis for processing**

The legal basis for the intended purposes of the processing referred to above lies in:

- Taking pre-contractual measures at your request and/or implementing the agreement concluded with you (Article 6 paragraph 1 sub b of the EU General Data Protection Regulation, hereinafter GDPR).
- The compliance with legal obligations (Article 6 paragraph 1 sub c GDPR).
- The representation of legitimate BTE interests or those of a third party (Article 6 paragraph 1 sub f GDPR).
- The consent given by you, to the extent that this is requested in the relevant situation (Article 6 paragraph 1 sub a GDPR).

For the above purposes numbered 3 through 7 inclusive, BTE relies on the principle of legitimate interest. The legitimate interest of BTE lies in being able to perform its normal business operations. BTE holds the view that the importance of its business operations outweighs the potential privacy of the data subject. You can oppose this processing on the grounds of the right of objection. You can read more information about that below.

### **Obligatory provision**

When we ask you for personal data, we will state for each situation whether the provision of the data is necessary or obligatory and what the (possible) consequences are if the data are not provided. The basic principle in this regard is that BTE will process the quantity of personal data required for the purposes described above and nothing more.

### **Exchange with third parties**

BTE shall not provide your data to third parties, except to the extent that:



- the third parties are also involved in the execution of the agreement with you or your organisation, but only to the extent that the exchange is necessary for this;
- you have given your prior consent for the particular provision; or
- BTE is required by law to provide data.

The parties concerned process the data in accordance with their own privacy policies. If required you are advised to request that policy from the third concerned.

### **Automated decision-making and profiling**

BTE does not make use automated decision-making and/or profiling.

### **Retention period**

Your data are stored in accordance with our policy on retention period. In essence, this means that data are no longer than necessary. If you have specific questions about the policy, please contact us using the details provided below.

### **Protection of personal data**

BTE will take appropriate technical and organisational measures (or ensure these are taken) to protect personal data against loss and any form of unlawful processing. In that context, various measures have been taken, including encryption of data, encrypted communication and treating the data as confidential.

### **Your rights**

You have various rights according to law. We list the rights for you as follows.

- Right of inspection: you have the right to view the personal data processed by BTE.
- Correction and deletion right: the right to have data changed or even deleted if the data are not (no longer) correct, or if the processing is not (no longer) justified.
- The right of objection: this means that you can object to certain processing of personal data because of your specific situation. We will always honour an objection to processing for direct marketing purposes.
- Right to limitation: as far as the accuracy of the data is disputed by you, under certain circumstances you have the right to limit the processing of your data. In brief, this means that BTE temporarily 'freezes' the processing of the data.
- Right to data portability: the right to transfer all data retained by us and concerning you in ordinary, machine-readable format, or to request to have it sent to another controller.
- Revocation of consent: you have this right to the extent that we process data belonging to you on the basis of your consent. You have the right to withdraw your consent once given. We will then immediately stop the processing.

In addition, you are always free to file a complaint with the Data Protection Supervisor. The supervisor of privacy legislation is the Personal Data Protection Authority. You can find the contact details of the Personal Data Protection Authority through the website [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

### **Exercising the rights**

You can exercise the rights free of charge, except in case(s) of abuse. You can exercise the rights by seeking contact through the contact details below.

### **Time periods**

In principle we will answer your questions/requests within a period of one month. In the answer to your question/request should inadvertently happen to take longer, we will inform you of this within one month. Depending on the complexity or number of requests, the response period may possibly take up to three months.

### **Identification**

In relation to all questions/requests, it is possible that we will ask you for further proof of your identity. This is done in order to prevent us from providing personal data to the wrong party or making incorrect changes in relation to the processing of personal data. To ensure that your request is processed as smoothly as possible, we kindly you to send a copy of your proof of identity in advance.

### **Individual consideration given to every request**

We would like to point out that the rights described above do not constitute absolute rights. Circumstances may arise that prevent us from granting a particular request. We will always assess each request on its own merits. If we happen to be unable to grant a particular request, we will of course provide you with a properly substantiated reason for this. In that case, you can then decide to approach the supervisor or, as the case may be, the court.

The right of objection against the use of data for direct marketing purposes and the right to withdraw consent is absolute, however. Whenever these rights are exercised they will therefore always be honoured.

### **Questions**

Furthermore, you are by all means free to ask questions about the personal data processed by us. For questions concerning privacy, please contact us using the contact details provided below.

### **Changes**

This Privacy Statement is subject to change. These changes will be published on the BTE website.

BTE may process your personal data for new purposes not yet listed in this Privacy Statement. In that case we will contact you before using your data for these new purposes to inform you of the changes to our regulations on the protection of personal data and to give you the opportunity to refuse participation.



### Contact details

If you have any questions about this privacy statement or our privacy policy, or you wish to exercise one of your legal rights, please contact us using the details below:

BTE Holding B.V.  
PO Box 11  
6669 ZG Dodewaard  
The Netherlands  
E-mail: [privacy@bte.nl](mailto:privacy@bte.nl)

