# Privacy Statement loyalty program

02-10-2023

Your personal data may be collected when using our loyalty program. This personal data is used by

HLC Wereld B.V..

Our loyalty program consists of a loyalty card (App) and can also be expanded with a gift card. The gift card is by definition anonymous. However, there is also the possibility to provide this gift card with personal data which will also fall under this privacy statement. We have drawn up this privacy statement to indicate that we take the privacy of all customer data with which we come into contact via our loyalty program very seriously. For this reason, the personal data collected by us are carefully processed and secured. This, in accordance with the requirements of the privacy legislation. In the following pages you can read how we process, use and secure your personal data.

Purposes of collecting your personal data We collect your personal data for the following purposes:

- Offering a loyalty program with associated savings targets, benefits and offers, depending on the rules/conditions linked to your card;
- Keeping track of all card transactions to determine your card balance;
- Providing an online account where you can manage your personal data;
- Providing an loyalty card App (optional) where you can store you loyalty card;
- Offering access to your loyalty card balance on our website;
- To keep you informed of your card balance by e-mail, and to make suggestions for spending options if you have granted us permission to do so;
- To congratulate you on and / or just before your birthday by e-mail and / or to make a special birthday offer if you have granted us permission to do so;
- Making and maintaining contact with you;
- Sending newsletters if you have granted us permission to do so;
- The sending of offers if you have granted us permission to do so;
- gaining insight into the use of our loyalty program and improving and evaluating our loyalty program.
- Retrieving your card details in case you lose your card ore your card is stolen;
- Offering the possibility to also receive loyalty points without having your card with you. Only when you have the right to receive these points.

We will not use your personal data for other purposes than the above-mentioned purposes, unless;

- You have given your permission to do so,
- This is necessary to offer you our loyalty program
- Or we may or must do so by law.

## Categories personal data

We use the following information for the purposes mentioned in this privacy statement:

- Initials / first name;
- Last name;
- Company Name;
- Street name:
- House number;
- Postal Code;
- · City;
- Phone number:
- E-mail address:
- Date of birth

When using an online account for our loyalty program, we process the following data in addition to the above personal data:

- Log-in data linked to you (login name and password where the latter is not saved by us and therefore not accessible to us) If you have forgotten your password, you can request a new password via the consumer portal);
- All transactions that are done with your card (s);
- Amounts spent;
- The conversion of the amount spent to points in the case of the loyalty card;
- The date and time of the transaction:
- Whether it is the issuing or redemption of lolyaty points; in which store and on which terminal the transaction took place.

## Retention periods

We do not store your personal data longer than necessary for the purposes mentioned in this privacy statement. For example, we will retain your personal data relating to the loyalty program until you terminate your participation in the program. For the duration of the participation we will keep your e-mail address for sending out newsletters until you unsubscribe from us.

# Confidentiality & data provision to third parties

We will treat all your personal data that we collect from you for our loyalty program with the upmost confidentiality. For example, we will not provide, lend, rent or sell your personal data to third parties for marketing purposes of these parties without your permission. We will share your personal data with MAKS Klantenloyaliteit. MAKS Klantenloyaliteit is our supplier of the platform on which our loyalty program is running, and sharing your personal data with MAKS Klantenloyaliteit is necessary to offer you the loyalty program.

We have written agreements with these parties to ensure the secure handling of your personal data. These parties will not use your personal data for purposes other than the loyalty program, unless you have given permission for this or this is necessary for the provision of the services related to the loyalty program. Or when we may or must do so on the basis of the law. The information you provide will be treated with the utmost care.

#### Security

We take appropriate security measures to limit misuse of, and unauthorized access to, your personal data. In this way we ensure that only the necessary persons have access to your data, that access to your personal data is protected and that our security measures are checked regularly.

- access to the datacenter is only possible for authorized persons;
- use of firewalls;
- use of DDOS protection;
- active maintenance of the servers and monitoring of the servers for problems / attacks.
- all cloud communication has been encrypted;
- authentication through strong passwords is standard;
- passwords are hashed to the cloud (on top of the standard encryption) and stored in a hashed manner in the database;
- password guessing attacks are automatically blocked after a few attempts;
- Transaction data cannot be changed by definition, only "insert" and "read out" are possible.
- backups of personal data.

#### Newsletter

If you have given permission to receive our newsletter, it can be used to inform you about relevant and interesting promotions and offers. If you no longer wish to receive this information, you can unsubscribe via a link in the newsletter.

Applicability of the privacy statement

This privacy statement only applies to the use of the loyalty program of:

HLC Wereld B.V.

provided by MAKS Klantenloyaliteit to

HLC Wereld B.V.

This privacy statement is therefore not applicable to other services and / or activities of:

HLC Wereld B.V.,

and MAKS Klantenloyaliteit or any third parties.

## Rights of data subjects

If you have provided us with personal data, you can send us a request to view, change, move or delete this data. You can also request to limit the processing of your data. In addition, if you have an online account in the consumer portal for the service you use, you can also exercise part of your statutory rights in your online account, where you can also check your balance. You can view, change and withdraw your consent to the newsletter here. If you wish to submit a request for the exercise of one of your statutory rights, you can submit it by sending an e-mail to

klantenkaart@restaurantorange.nl,

or by contacting us by telephone via

055-3031688.

Changes to this privacy statement

MAKS Klantenloyaliteit reserves the right to make changes to this privacy statement. Therefore, check this privacy statement regularly so that you are aware of any changes.

#### **Authority Personal Data**

Of course we are happy to help you further if you have complaints about the processing of your personal data. Under the privacy legislation, you have the right to file a complaint with the Dutch Data Protection Authority against our processing of your personal data. You can contact the Dutch Data Protection Authority via the website of the Dutch Data Protection Authority

(https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons).

#### Contact

If, after reading this privacy statement, you still have questions and / or comments about your personal details regarding your loyalty card and / or gift card, please contact us using the contact details below.

Company: HLC Wereld B.V.

Website: https://www.restaurantorange.nl/ Address: Het Rietveld 8, 7321CT, Apeldoorn

KvK: 58189378 Telephone: 055-3031688

E-mail: klantenkaart@restaurantorange.nl