



# PRIVACY STATEMENT

Last revised on: 18-08-2020

## 1. WHO DOES THIS PRIVACY STATEMENT APPLY TO?

1.1 This Privacy Statement applies to the following companies:

BELGIUM	NETHERLANDS	LUXEMBOURG
<b>Astra Sweets nv Sweet Paradise nv</b>	<b>Astra Faam BV</b>	<b>Sweet Paradise SA</b>
Registered office: Bleukenlaan 18, 2300 Turnhout	Registered office: Hermesweg 4, 8861 VN Harlingen	Registered office: rue du Chemin de Fer 1, 8378 Klein Bettingen

1.2 Astra Sweets nv and Astra Faam BV, together with Sweet Paradise nv and Sweet Paradise SA, are part of the Astra Groep (“We”), which specialises in the production of candy. Our clients include supermarkets, candy specialists, drug stores, wholesalers and petrol stations, among others.

1.3 Astra Sweets nv, Astra Faam BV, Sweet Paradise nv and Sweet Paradise SA are separate and independent legal entities that process personal data. Depending on the processing activity, they may be considered to be a separate controller or joint controllers.

1.4 We do our utmost to protect and process the personal data entrusted to us in a correct and transparent manner, namely in accordance with the applicable law and in particular with the General Data Protection Regulation 2016/679 of 27 April 2016 (GDPR).

## 2. WHAT DOES THIS PRIVACY STATEMENT COVER?

2.1 This Privacy Statement is intended to inform you how and why we process your personal data as a controller when we carry out our activities or when you make use of the Websites and the forms and applications provided there, to whom we transfer this information, what your rights are and who you can contact for more information.



2.2 When we refer to “the Websites”, we mean the webpages beginning with the following URL:

- [www.astrasweets.com](http://www.astrasweets.com): the Astra Sweets website;
- [www.my-frisia.com](http://www.my-frisia.com): the website about the candy sold under the brand name Frisia;
- [www.sweetparadise.be](http://www.sweetparadise.be): the Sweet Paradise website (candy pick & mix);
- [www.paradisefinest.com](http://www.paradisefinest.com): the Paradise Finest website (nuts pick & mix).

This Privacy Statement does not, however, apply to the webpage beginning with the URL <https://www.astrasweets.com/en/work-job-openings/job-openings/>, where you can apply for job vacancies in our company. Our separate privacy statement for applicants applies to this: [www.astrasweets.com/nl/privacyvacatures.html](http://www.astrasweets.com/nl/privacyvacatures.html)

The Website may contain links to other websites. Although we endeavour only to provide links to websites that share our high data protection standards, we are not responsible for the content and data protection policy of these websites. This Privacy Statement relates only to data collected by us.

When you click on links on the Websites, we strongly advise you first to read the Privacy Statements on the websites concerned before releasing personal data.

2.3 Please note that when you visit our pages on Facebook (“Astra Sweets nv”, “Frisia Astra Sweets” and “Sweet Paradise”) or on LinkedIn (“Astra Sweets”), whether or not via a shortcut on our website, cookies are processed by Facebook. Based on this, we can obtain more information - fully anonymously - about the people who visit our social media pages.

For more information about why and how personal data are processed in this context, we refer to the Privacy Policy and the Cookie Policy on the websites of Facebook and LinkedIn:

Facebook cookie policy:	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
Facebook privacy policy:	<a href="https://www.facebook.com/about/privacy/">https://www.facebook.com/about/privacy/</a>
LinkedIn cookie policy:	<a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>
LinkedIn privacy policy:	<a href="https://www.linkedin.com/legal/privacy-policy?_l=nl_NL">https://www.linkedin.com/legal/privacy-policy?_l=nl_NL</a>

### 3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?

3.1 We process your personal data for legitimate business purposes. These purposes include but are not limited to:

- customer and supplier management;
- consumer management;
- trade fair follow-up;
- management of other business contacts;
- management of orders and deliveries;
- invoicing and accounting;
- providing information about our company, products, services and special offers;



- the efficient organisation of our services;
- sales;
- advertising;
- organisation of competitions;
- dealing with questions, requests and complaints;
- dispute management;
- public relations;
- statistics and market research;
- security;
- access control;
- compliance with legal obligations.

#### **4. ON THE BASIS OF WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?**

4.1 We process your personal data for the aforementioned purposes:

- with a view to concluding and fulfilling agreements concluded with you, including (but not limited to) accounting, invoicing and deliveries;
- to comply with legal obligations;
- in the context of the legitimate interests of our company and/or a third party, such as (but not limited to) the smooth running of our business activities, customer and supplier management, etc., and after having conducted a balancing of interests. If you would like more information about this, please contact us.

4.2 If we are obliged by law to obtain your freely given, informed, specific and unambiguous consent to process your personal data for specific purposes (e.g. very specific market research activities), we will only process your data for these purposes if we have received such consent from you.

Before sending our newsletters, we will always request your express consent, unless we have obtained your email address in the context of the sale of related products or services and you have not objected to such use of your data. You can unsubscribe at any time by clicking on the unsubscribe button in the newsletters.

#### **5. WHAT ARE YOUR RIGHTS?**

5.1 You have various rights relating to the personal data that we process concerning you. In particular, you have the right to:

- access your personal data and obtain a copy thereof;
- ask to have your personal data updated or rectified, if you believe that they are incorrect or incomplete;
- ask for your personal data to be erased, or for the way in which we use your personal data to be restricted, if you believe that we do not or no longer have legitimate grounds for processing;
- withdraw your consent to the processing of your personal data (insofar as the processing is based on your consent);



- receive your personal data in a structured, commonly used and machine-readable format and transmit these data to another party (insofar as the processing is based on consent or the fulfilment of an agreement);
- object to the processing of personal data for which we use legitimate interests as a legal ground, upon which we will stop the processing unless we have overriding legitimate grounds for the processing.

5.2 You also have the right to object to the process of personal data for direct marketing at any time by contacting us (see below) or by clicking on the unsubscribe link in the direct marketing messages sent by us. When applicable, we will no longer process your personal data for direct marketing purposes.

5.3 With a view to the exercising of the above rights, you can contact the privacy coordinator of the Astra Groep by:

- sending an email to [privacy@astrasweets.com](mailto:privacy@astrasweets.com);
- calling 0032 (0)14 443520;
- sending a written request to Bleukenlaan 18, 2300 Turnhout Belgium, addressed to the privacy coordinator.

You can also use these contact details if you wish to make a complaint relating to the processing of personal data.

5.4 If you are dissatisfied with the way in which we treat your personal data, you have the right to file a complaint with the supervisory authority of the member state in which you are usually resident.

## 6. HOW DO WE OBTAIN PERSONAL DATA?

6.1 We can obtain personal data concerning you in the context of the performance of our activities.

6.2 We can obtain such personal data because you give them to us (for example, via a form on the Websites, by contacting us, by handing over your business card at trade fairs, etc.), because others give them to us (for example, third-party service providers whom we call upon in the context of our activities or your employer, trade fair organisers, etc.), or because they are publicly available.

We can also obtain personal data from you through the way in which you interact with us.

6.3 When we obtain your personal data from other parties, we make reasonable efforts to conclude contractual clauses with these parties which oblige them to comply with the relevant rules on data protection. This may consist, among other things, of this party providing you with all necessary information or - if need be - obtaining your consent to process the personal data as described in this Privacy Statement.



## 7. WHICH PERSONAL DATA DO WE COLLECT?

- 7.1 The personal data that we collect may include the following:
- standard identification and contact details (e.g. name, address (home/work), telephone number (home/work), email address (home/work));
  - personal information (e.g. age, gender, date of birth, place of birth, nationality, language, etc.);
  - financial data (e.g. bank account number, etc.);
  - employment data (e.g. the organisation you work for, your job title, etc.);
  - the information provided by you on forms (e.g. contact forms) and to all possible services and communication channels that we offer;
  - data on how you use our products and services;
  - visual material of products supplied and/or services provided;
  - camera images;
  - data relating to your participation in competitions;
  - data on how you interact with us (e.g. if you visit us at a trade fair or make contact with us via the website) and other similar information.

## 8. WHO CAN WE TRANSFER YOUR PERSONAL DATA TO?

- 8.1 We can transfer your personal data to affiliated companies or third parties that reasonably need access to these data in order to achieve one or more of the aforementioned purposes. This may involve the following third parties, among others:
- external service providers which the Company calls upon for various business services (e.g. agencies that take care of the organisation of our competitions);
  - law enforcement and government bodies in accordance with the applicable legislation;
  - external professional advisers (e.g. lawyers or consultants of the Company).
- 8.2 We do not transfer your personal data to recipients located in countries outside the European Economic Area (EEA) where the legislation does not offer the same level of data protection.

## 9. WHICH COOKIES DO WE USE AND HOW CAN YOU MANAGE THEM?

- 9.1 These Websites use cookies. Cookies are small text files that are stored on your computer or mobile device by your browser when you visit these Websites. They are used to provide a good browsing experience and to enable you to use the services on these Websites.  
More information about cookies is available on the following website: [www.allaboutcookies.org](http://www.allaboutcookies.org).
- 9.2 Cookies can be divided up based on the following characteristics:
- 9.2.1 Depending on whether they are “*session cookies*” or “*persistent cookies*”:
- **Session cookies:** these cookies are erased automatically when you close your browser.



- **Persistent cookies:** these cookies are not erased automatically when you close your browser, but remain stored on your computer or mobile device for a certain period of time (this varies from cookie to cookie).

9.2.2 Depending on whether they are “*first party cookies*” or “*third party cookies*”:

- **First party cookies:** these cookies are installed by us or by one of our processors.
- **Third party cookies:** these cookies are installed by a data controller that does not manage this Website. We do not have access to or control over these cookies and these cookies are subject to the privacy statements of the third parties.

9.3 On the websites [www.astrasweets.com](http://www.astrasweets.com) and [www.my-frisia.com](http://www.my-frisia.com) we use **functional cookies**. These are session cookies. They are vitally important to enable the Website to function. Without these cookies, this website would not work as impeccably as you would expect and you would not be able to use all the functionalities.

9.4 On the website [www.my-frisia.com](http://www.my-frisia.com) we use **analytical cookies** provided by Google Analytics of Google Inc (“**Google Analytics**”) to collect statistics about your visit to this Website, in order to improve its functioning and design (“*web audience measuring*”). They collect information about how many times you visit this Website, how long the visit lasts, etc.

For more information on the use of Google Analytics cookies, please click on this link: [Google Analytics](#). To prevent the use of Google Analytics, you can install the “Google Analytics opt-out browser add-on”.

9.5 On the website [www.sweetparadise.be](http://www.sweetparadise.be) we use **functional cookies**. They are vitally important to enable the Website to function. Without these cookies, this website would not work as impeccably as you would expect and you would not be able to use all the functionalities.

The functional cookies involved are listed below:

COOKIE NAME	FUNCTION
SESSIONID	This cookie is used to identify a session (“Session identifier”)
Webalive-localhost-visit-language	This cookie is used to remember the language you selected.
Webalive-xxx-login	This cookie stores the user name of the user who logged in.

9.6 On the website [www.paradisefinest.com](http://www.paradisefinest.com) we use **analytical cookies** to gather statistics about your visit to this Website in order to improve its functioning and design (“*web audience measuring*”). They collect information about how many times you visit this Website, how long the visit lasts, etc. The analytical cookies on the website are provided by Google Analytics of Google Inc. For more information



on the use of Google Analytics cookies, please click on this link: [Google Analytics](#). Google will not use your IP address in combination with other data.

To prevent the use of Google Analytics, you can install the “Google Analytics opt-out browser add-on”.

- 9.7 You can turn cookies on or off and/or remove them via your browser. The cookie settings can usually be found in the “options” or “settings” menu of your browser. The following links may be useful to gain a clearer understanding of these settings. You can also use the “Help” button on your browser for more information:
- Cookie settings in Internet Explorer
  - Cookie settings in Firefox
  - Cookie settings in Chrome
  - Cookie settings in Safari

Please note that by turning off certain cookies, you may no longer be able to use certain applications on this Website, such as the closed environment for registered users.

## 10. ARE YOUR PERSONAL DATA PROTECTED?

- 10.1 We take stringent technical and organisational (security) measures to protect your personal data both online and offline from access by unauthorised persons, unlawful processing, improper use, damage, loss and destruction.
- 10.2 These measures include, among other things:
- training for staff members concerned to ensure that they are aware of our data protection obligations when they handle personal data;
  - administrative and technical checks to restrict the access to personal data to that which is necessary;
  - technical security measures, including passwords, firewalls, anti-virus software and encryption;
  - physical security measures such as security badges to prevent access to our company premises.
- 10.3 Although we take appropriate security measures as soon as we receive your personal data, the transfer of data via the internet (including email) in particular is never entirely secure. We do our utmost to protect your personal data but can never fully guarantee the security of the personal data sent to or by us.

We restrict access to your personal data to persons who reasonably need this information to carry out their tasks.

## 11. HOW LONG ARE YOUR PERSONAL DATA KEPT?

- 11.1 As a general rule, personal data processed in the context of the use of our services are kept for a period of 10 years as of the end of the contractual relationship (including guarantee periods and after-sales services).



- 11.2 In principle, we keep personal data processed in the context of direct marketing, for example for our newsletters, for a period of 5 years as of the last contact with our company. We can, however, keep your personal data longer for these purposes if you have become a customer of ours in the meantime, i.e. for a period of 10 years as of the last product delivered or service provided, or as of the last contact with our company should this take place later.
- 11.3 Camera images are kept for 30 days unless a breach has been observed in these images. In that case, we keep the images as long as is necessary in the context of any claim or proceedings.
- 11.4 Depending on the specific situation, we can always keep your personal data for longer periods. This will be the case in particular if one of the following periods is longer: (i) as long as necessary for the activity or service concerned; (ii) the storage period required by law; or (iii) the prescription period within which legal proceedings can be started.

## **12. ARE YOUR PERSONAL DATA USED FOR AUTOMATED DECISION MAKING?**

- 12.1 Automated decisions are decisions about people based solely on the automated processing of personal data and which produce legal effects that significantly affect the people concerned.  
Generally speaking, we do not use personal data for automated decision making. This means we do not take any decisions concerning you that are based solely on the automated processing of personal data.

## **13. HOW CAN YOU CONTACT US?**

- 13.1 If you have any questions about this Privacy Statement or the Websites in general, you can contact the privacy coordinator of the Astra Groep by:
- sending an email to [privacy@astrasweets.com](mailto:privacy@astrasweets.com);
  - calling 0032 (0)14 443520;
  - sending a written request to Bleukenlaan 18, 2300 Turnhout Belgium, addressed to the privacy coordinator.

## **14. MODIFICATIONS TO THIS PRIVACY STATEMENT**

- 14.1 We may adapt this Privacy Statement from time to time. In order to inform you of the most recent adaptation of this Privacy Statement, we will alter the revision date at the top of the page with each modification. The adapted Privacy Statement will then apply as of this date.  
Please consult this page regularly to remain informed of modifications and additions. If we have your email address, we will also inform you electronically of every modification to this Privacy Statement.