

Privacy Policy Forelle B.V.



Effective date: May 25th, 2018.

Forelle B.V. Marie Curieweg 2, 6045GH Roermond, The Netherlands.

Dutch Chamber of Commerce Number 12063684.

Forelle B.V. ("us", "we", or "our") operates the www.forelle.com website (the "Service"). We offer sports equipment through our web shop to customers across Europe. The leading data protection authority is the Dutch Data Protection Authority.

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://www.forelle.com/faq/general-terms-conditions/>.

Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

Types of Data Collected

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information ("Personal Data") that can be used to identify you and contact you about your order(s) when necessary. The purpose of your personal data is to process and bill orders correctly. Personally identifiable information may include, but is not limited to:

| Source | Information (All non-DPIA) | Purpose | Lawfulness of processing | Saved for |
|--|---|--|--|---|
| Forelle Customer Account Information (Direct by customer) | Salutation | Processing and billing of orders, shipment of parcels. | 1. The subject has given consent to the processing of his or her personal data for one or more specific purposes. 2. Processing is necessary for the performance of a purchase agreement/contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a purchase agreement/contract. | Lawfully a minimum of 7 years. Can be deleted upon request |
| | Customer first name | | | |
| | Customer surname | | | |
| | Billing company/club | | | |
| | Billing address (street and house number) | | | |
| | Billing zipcode | | | |
| | Billing city | | | |
| | Billing country | | | |
| | Delivery company/club | | | |
| | Delivery address (street and house number) | | | |
| | Delivery zipcode | | | |
| | Delivery city | | | |
| | Delivery country | | | |
| | Phone | | | |
| | Fax | | | |
| Forelle account e-mail | Account creation and security for new customers | Until account deletion | | |
| Order specific customer remarks and information | | | | |
| Forelle account password | | | | |

Payment Data

Depending on the payment method a customer chooses to use, the following additional information might be collected. The purpose of this info is to process your payment.

| Source | Information (All non-DPIA) | Purpose | Lawfulness of processing | Saved for |
|---|---|---|--|---|
| Mollie Payment Systems (Indirect through Mollie) | Name bank account holder (first,surname) IBAN BIC Last four numbers of credit card number Type of credit card | Processing of payments | Processing is necessary for the performance of a purchase agreement/contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a purchase agreement/contract | Lawfully a minimum of 7 years. Can be deleted upon request |
| Paypal (Indirect through Paypal) | Paypal E-mail | Processing of payments | " | " |
| Store Sales (Direct by customer) (Indirect through bank of customer) | Customers might provide billing info. This is not necessary. PIN payments: Last 4 numbers card nr Creditcard payments: last 4 numbers card nr | Adding custom billing info to generic invoice Processing of payments | The subject has given consent to the processing of his or her personal data for one or more specific purposes Processing is necessary for the performance of a purchase agreement/contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a purchase agreement/contract | " " |

Newsletter subscription

Customers can voluntarily sign up for our newsletter. The purpose of this information is to contact you with the latest news and special offers. You can unsubscribe freely at any time using the link at the end of the email. The following can be provided to stay up to date via E-mail.

| Source | Information (All non-DPIA) | Purpose | Lawfulness of processing | Saved for |
|------------------------------------|--|---|---|----------------------|
| Newsletter (Direct by customer) | Salutation First name Surname Company/club Newsletter e-mail | Providing commercial offers and latest news | The subject has given consent to the processing of his or her personal data for one or more specific purposes | Until unsubscription |

Usage Data

We may also collect information how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

- Examples of Cookies we use:
 - **Session Cookies.** We use Session Cookies to operate our Service.
 - **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
 - **Security Cookies.** We use Security Cookies for security purposes.

Use of Data

Forelle B.V. uses the collected data for various purposes:

- To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

Transfer of Data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

In order to process your orders/payments we share the necessary information with our web designer, transport partners, and banks. If you choose to subscribe to our newsletter we will share this information with our web designer and Mailchimp.

If you are located outside the Netherlands and choose to provide information to us, please note that we transfer the data, including Personal Data, to the Netherlands and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Forelle B.V. will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the GDPR and this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Disclosure of Data

View, edit or delete your personal data

Our customers have the right to view, edit and delete their personal data. Send your requests to info@forelle.com. Please note that it takes up to one month to delete all your information from our servers. For your own security we will ask for a copy of your ID card or Passport. Customers also have the right to file a complaint at the Dutch Data Protection Authority.

Legal Requirements

Forelle B.V. may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Forelle B.V.
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

Dutch corporate law dictates that Forelle is to keep personal information from orders for at least 7 years.

Security of Data

Forelle uses a double firewall setup in addition to a SSL/TLS certified website and mailbox system. Anti-virus software is in place. According to GDPR we have data processing agreements with the necessary abovementioned processing parties. At the time of writing our systems are up to date and we keep it this way continuously.

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security. In case of information leaks of sensitive information we are required to notify the victim(s) and the Dutch Data Protection Authority. This will be done using legally set Data Breach procedures.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

- **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>.

Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your children have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: info@forelle.com
- By visiting this page on our website: <https://www.forelle.com/privacy-statement/>