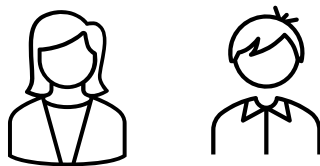


DATA PROTECTION GUIDE FOR EMPLOYEES

During your work for Van de Velde and its associated enterprises (referred to hereinafter as “**Van de Velde**”) you may be asked to store, use, modify or transfer data.

If this data is (directly or indirectly) related to a person, it will be deemed to be personal data under EU law. In this guide, you will find **dos and don'ts** about dealing with personal data.

1. What is personal data?



“Personal data” is a **broad concept**.

Among other things, it may concern the names, contact details, financial details, employment history, usernames, passwords, IP addresses and shopping behaviour of an individual (the “**subject**”).

This isn't just the case if it is connected to a name in a database or a list. Data that is not connected to a name can also be qualified as “personal data”.

- For example, a list of purchases that is linked to a customer ID is deemed to be “personal data” if someone at (or even outside of) Van de Velde is able to link the customer ID to the customer's name.
- Likewise, knowledge of the age, the position in a company and the phone number of a subject is enough to identify that subject.

For that matter, data relating to companies may also be personal data: the email address, business phone number and office address of a representative are personal data, for example.

2. What is this guide for?



There are rules in the EU with regard to what you can and cannot do with personal data.

There is “processing” of personal data in case of storage, use, adaptation, deletion, transfer or even simply providing access (including remotely) to the personal data in question. In other words, **everything you do with personal data is regulated.**

Enterprises such as Van de Velde must therefore protect the rights of all subjects whose personal data is processed. Failure to comply with these laws may lead to the imposition of substantial fines.

Accordingly, Van de Velde wishes to ensure that all employees (from HR employee to sales representative) that come into contact with personal data are fully aware of the dos and don'ts with regard to personal data.

3. Dos and don'ts when processing personal data

At Van de Velde we are proud to be an organisation that has a privacy-conscious corporate culture and complies with the rules. By applying the dos and don'ts, we can achieve this goal as an organisation.



DON'T!

- **Never assume that you can use existing personal data for new initiatives.** On the contrary, use personal data only for the permitted, intended purposes.

Example: Van de Velde collects name and e-mail address of consumers during a contest on www.mariejo.com. These data are collected in order to contact the winner of the contest. These personal data cannot simply be used to send newsletters.

- **Do not use outdated lists with personal data.** We encourage you to always work directly from the relevant database.

Example: An address list is created to send postcards to consumers that gave their consent for this. The same list cannot be used anymore for the following postcard, as certain personal data on the list could in the meantime be outdated. A new list should always be created and deleted after use.

- **Never share personal data, even with colleagues, except where strictly necessary.** Treat all data as confidential and protect them.

Example: For an email newsletter, a service provider most likely needs only the name and email address of the customer, not the customer's postal address. Select the correct fields from the database or the correct columns from a spreadsheet rather than transferring the whole database.

- **Never share personal data with service providers without a prior check.** You should only share data with service providers after you have verified that this is permitted.

Example: If you use a (new) third party and that third party processes personal data, Van de Velde must always notify the subject of the use of that specific (type of) third party. So always check first whether this (type of) third party is named in the (in-house and/or external) privacy policy and whether the subject has been adequately informed. A processing agreement will also likely need to be signed with this service provider.

- **Do not process personal data related to a child or a subject's health, race, religious belief or criminal record (including suspected criminal involvement).** Extra layers of protection are allocated to some categories of personal data, which must be handled with greater care.



DO!

- **Check that the data that is processed is correct and up to date.** If you notice that personal data of an employee, consumer, retail partner or service provider has been changed, update the relevant database (or request that it be updated).
- **Limit the collection and processing of personal data to what is strictly necessary.** Keep in mind that Van de Velde must be able to justify all collected and processed personal data. Start by determining what type of personal data is necessary and ask only for that data (both in-house and externally).

Example: A contest is organised by the marketing department. Only personal data that are necessary for the organisation of the contest and contacting of the winner may be collected. It is not necessary to collect the birth date of the consumers.

- **Share privacy related questions with privacy@vandevelde.eu.** Van de Velde has procedures and documentation to respond to the most common questions.

Example: You receive an e-mail from a consumer requesting to send her all personal data that Van de Velde processes about her. Contact privacy@vandevelde.eu, so that the request can be answered timely and correctly.

- **Lock your own devices and equipment (such as a computer or phone) when not in use.** This way we avoid that others get unauthorized access to personal data.

- **Check whether it is permitted to send commercial messages to the selected recipients.**

Example: Consent is required before sending newsletters or marketing campaign materials to individuals via email.

- **Apply the data protection principles by design and standard settings for every new initiative.**

Example: As a default setting for acceptance of cookies on our websites, only check the necessary cookies.

- **Check whether a *Data Privacy Impact Assessment (DPIA)* is required.** At the start of a new project that has an impact on personal data, check whether a DPIA needs to be completed. Contact privacy@vandevelde.eu.