

Privacy Statement Libéma

Gulbergen Exploitatie B.V. ("Golf De Gulbergen") is a subsidiary of Libéma Exploitatie B.V. ('Libéma'). Libéma and its associated companies attach great value to the protection of your privacy. We always process your personal data carefully and in accordance with the privacy legislation and our internal Privacy Policy.

In this Privacy Statement, we inform you about the processing of your personal data. We reserve the right to change its content. The most up-to-date version will be available on our website.

In this Privacy Statement you will find information on the following topics:

- 1. Who is responsible for processing your personal data?**
- 2. For what purposes and on what basis do we process your personal data?**
- 3. Who has access to your personal data?**
- 4. How do we secure your personal data?**
- 5. How long do we keep your personal data?**
- 6. What rights do you have in relation to the processing of your personal data?**
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- 8. What about the use of your personal data on a third-party website?**

1. Who is responsible for processing your personal data?

Libéma Exploitatie B.V. ('Libéma'), located at Graafsebaan 133 in (5248 NL) Rosmalen, is the controller of the processing of your personal data by all Libéma affiliated companies.

2. For what purposes and on what basis do we process your personal data?

Libéma processes your personal data for specific and legitimate purposes and only if it can invoke one of the bases in the General Data Protection Regulation ('GDPR').

Libéma processes for the following purposes including (if necessary) your name, address, date of birth, e-mail address, telephone number, bank details and photograph.

Provision of products and services or cooperation

Libéma processes your personal data for the sale of its products and services or because of the cooperation it has entered into with you (such as with influencers, suppliers or sponsors) based on the performance of the agreement entered into with you.

Direct marketing and satisfaction research

After the delivery of our products and services, we have a legitimate interest to analyse your data within our customer data platform and to approach you with commercial messages for similar products and services ('direct marketing'), to invite you to a relationship event and to invite you to a satisfaction survey so that we can constantly improve your customer experience.

You can also register and consent to receiving our newsletter. For both the commercial messages we send to existing customers and the receipt of the newsletter, you can unsubscribe at any time. There is an unsubscribe link at the bottom of each e-mail.

Contact form website

If you fill in our contact form on the website, we process your personal data based on your consent to contact you.

Cookies website

When visiting our website, you will be shown a cookie banner, informing you about the types of cookies and allowing you to consent or not. For more information on this, please refer to our cookie statement.

If you consent to the placement of tracking cookies, we may display personalised ads to you with media partners. This consent can be withdrawn at any time.

Mobile app

If you use our mobile app, you can optionally log in. In this case, we will process your personal data based on your consent, in order to provide you with a more personalised experience during your visit (personalised advice). The moment you uninstall the app from your mobile phone, the personal data in the app will be deleted.

Recording telephone calls

Libéma reserves the right to record telephone calls. If this is the case, you will be informed of this during the phone call. Libéma will only use these recordings for its legitimate interest, namely internal training purposes. The recordings will not be further distributed or provided to third parties.

Camera surveillance

In the various Libéma locations, camera surveillance takes place in demarcated areas (such as at entrances, exits and barriers) to ensure the safety and property of our visitors and staff. This camera surveillance is based on our legitimate interest. Each location is clearly marked where camera surveillance takes place.

Images

If you apply to be a model for one of our marketing campaigns, we process your personal data based on our legitimate interest to find suitable models for our campaigns.

The moment you are hired as a model to take photos for the purpose of one of our marketing campaigns, the processing of your personal data, such as the photos taken, takes place on the basis of your consent. You will sign a quitclaim for this.

It is also possible that during your visit to one of our locations, image and/or sound recordings may be made for promotional purposes. This will be clearly indicated at the relevant location so that you can choose whether or not to enter the area where the recordings are made. When entering this area, you consent to the use of photographs in which you are recognisably shown.

Accident form

Should you experience an accident at one of our sites, we will process your personal data, which may include health data, in order to resolve it properly. Your personal data will be included in an accident form with your consent.

3. Who has access to your personal data?

At Libéma, only authorised personnel have access to your personal data and only if strictly necessary for the performance of their duties.

For the provision of our products and services, we engage suppliers who process your personal data under our responsibility and according to our instructions. These are mostly software companies. We conclude a processing agreement with each supplier and we only cooperate with suppliers who provide optimal security for your personal data.

There are situations when we need to provide your personal data to a third party, who further processes it for its own purposes. This is the case, for example, if the police request camera images after an incident or if we need to provide your personal data to our liability insurer to settle personal injury claims.

In principle, we process your personal data only within the European Economic Area ('EEA'). Should processing outside the EEA be necessary, we will take appropriate safeguards for this.

4. How do we secure your personal data?

Libéma makes every effort to secure your personal data as well as possible. In doing so, Libéma complies with the applicable security standards.

If, despite the security measures taken, there appears to be a 'breach in relation to your personal data' (also known as a 'data breach'), which poses a high risk to your privacy, you will be informed as soon as possible.

5. How long do we keep your personal data?

Libéma will not retain your personal data for longer than is strictly necessary for the performance of our activities, unless the personal data must be retained for longer under tax laws.

- After providing our products and services, we keep your personal data for up to 4 years to send you commercial messages about similar products and services, unless you object.
- We keep personal data that must be kept under tax laws for a maximum of 7 years.
- After participating in a satisfaction survey, we will keep your personal data for a maximum of 4 weeks to deal with any complaint or query.
- After completing our contact form, we keep your personal data for 2 weeks to process your enquiry.
- Recordings of phone calls are kept for up to 90 days.
- CCTV footage is kept for up to 4 weeks and up to 5 years in the case of a specific incident (statute of limitations on claims).
- Application data is kept for a maximum of 4 weeks and with your consent for a maximum of 1 year.
- Images (including quitclaim) will be kept as long as they are usable.

- Personal data in an accident form will be kept for a maximum of 5 years (limitation period for claims).
- Processing based on your consent is for as long as you do not withdraw this consent. After that, the personal data will be deleted immediately.

6. What rights do you have in relation to the processing of your personal data?

You can invoke the following rights under the GDPR:

- You have the right to access your personal data. This means that you can request which personal data we process about you.
- If you believe Libéma has incorrect personal data about you, you can have this personal data corrected.
- You can ask to have your personal data removed from the systems.
- You can ask to restrict the processing of your personal data for the period necessary to assess your requests or objections.
- You can request us to transfer your personal data to a third party.
- You can object to the processing of your personal data carried out on the basis of our legitimate interest, such as direct marketing.
- If Libéma processes your personal data with your consent, you can withdraw this consent at any time.

7. How can you complain or contact us about the processing of your personal data?

If you have a complaint about the processing of your personal data, have any questions about it or wish to invoke any of your rights, please contact us on 073-5282200 (on working days between 09:00 - 17:00) or by email: privacy@libema.nl.

You will receive a response from us as soon as possible. The settlement of any of your rights, will take place within the applicable period of 1 month.

In addition, you can file a complaint with the Dutch Data Protection Authority:

<https://autoriteitpersoonsgegevens.nl/en/submitting-a-tip-off-or-a-complaint-to-the-dutch-dpa>

8. What about the use of your personal data on a third-party website?

Libéma is not responsible for the processing of your personal data on any third-party website not affiliated to Libéma. We would like to refer you to the privacy statements of these third parties.