



# Zehnder privacy statement V2.5

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## 1. What is the purpose of this privacy statement?

In this privacy statement, we explain how we handle your personal data; we explain what personal data we collect and when, why we collect that data, on what basis we collect the data and for what purpose we collect the data. We also say how long we keep the data.

## 2. Who is responsible for looking after your data?

We are **Zehnder Group Belgium nv/sa** (hereafter: “**Zehnder**”), a leading manufacturer and distributor of innovative ventilation systems, designer radiators and related services.

We are located at Wayenborgstraat 21, 2800 Mechelen, Belgium. See our website [Zehnder België](#) for more information about our products and services. Zehnder is part of the Zehnder Group.

Zehnder is responsible for the collection and use of your personal data as described in this privacy statement. If you have any questions, comments or complaints regarding the processing of your personal data, you can contact us by using the contact details given in Section 7 of this privacy statement.

## 3. When does this privacy statement apply?

This privacy statement applies to all personal data that we collect and use when you visit our website, when you communicate with us by e-mail, telephone or fax or when you visit us.

## 4. What data do we collect and for what purpose?

### 4.1. General communication

If you send an e-mail, fax or letter or otherwise have business connection with us, we will make a record of the contact. If you call us, our support desk will also register your questions or complaints in our database. We may also monitor or record telephone conversations for training purposes and to improve the quality of our service.

We have a legitimate interest in processing the personal data you provide. We would like to respond to your e-mail, fax or letter to deal with your question, comment or complaint and thus provide good service. We will only use the personal data you provide to contact you to handle your question, comment or complaint.

### 4.2. Visiting Zehnder

When you visit our office, we will ask you at the reception to register as a visitor and fill in (and initial for) the following details: name, company name, date, arrival and departure times and the name of the Zehnder employee you intend to visit.

We have a legitimate interest in processing the personal data you fill in. In the event of an emergency, we need to know which visitors are present so we can take this into account when evacuating our building. That is in the interest of your and our safety.

#### **4.3. Contact forms**

If you fill in a contact form on our website, we will process the data you enter. The types of data to be entered depend on the form.

We have a legitimate interest in processing the personal data you fill in. We would like to respond to your question, comment or complaint or process your request. We will only use this personal data to contact you to respond to your question, comment or complaint or to process your request.

#### **4.4. Online tools**

Our website offers several tools to help you choose the right installation. If you use one of these tools, we will process the data you enter together with the advice based on it.

We have a legitimate interest in processing the personal data you fill in. We would like to send you the information generated with the tool to inform you about our products and to respond to any questions you might have about them. We will only use this personal data to contact you in order to send you the information generated and to answer any questions you might have.

#### **4.5. Newsletters**

You can sign up for our newsletters via our website. To sign up, enter your name and e-mail address and choose the capacity in which you will receive the newsletter. We use our newsletters to inform you about new products and services, about offers and about developments within Zehnder.

We use an "opt-in" principle for registering for our newsletters. This means that you can only register for our newsletter by entering your e-mail address and/or by actively registering for the newsletter by means of a checkbox.

In accordance with Section 5 of this policy, we may pass on your collected personal data to other members of the Zehnder Group as well as to third parties where this is necessary for acting on your request. These recipients could be in countries that do not have an equivalent level of data protection.

We process this personal data according to your consent. You can withdraw that consent at any time by unsubscribing from our newsletters. You can unsubscribe via a link at the bottom of each newsletter or by sending an e-mail to [marketing@zehnder.be](mailto:marketing@zehnder.be)

#### **4.6. Product registration**

Installers and end users can register the products listed on our website on the website itself under 'Product registration'.

When a product is registered by an end user, we process the following data: name, address & e-mail address of the end user, the serial number of the product, the date the product was installed and the name of the installer concerned.

When a product is registered by an installer, we process the following data: name, address, telephone number, e-mail address & company name of the installer, the serial number of the product and the installation date of the product.

We have a legitimate interest in processing the personal data you fill in. We use the personal data to fulfil any obligations, including warranty obligations, towards the installer or end user. If there is a product recall, we also use the aforementioned personal data to inform the installer and end user about any dangers or any adjustments to a product that might be needed.

#### **4.7. SSO**

When you create an account on the SSO and use the SSO, we collect and process the following data: name, company name, customer number, address data, telephone number and e-mail address.

Via the SSO you can access the specific applications, services and/or environments given below. We indicate any additional data processing that takes place.

We process the above data under the SSO for implementing the agreement that we conclude with you.

We will process the data per the SSO for as long as you use the SSO. If you have actively opted out of the SSO, we will delete the data within 30 (thirty) days. If you have not used the SSO for a period of 24 months, we will ask you whether you wish to continue using it. Finally, we will delete the data on the basis of the applicable user conditions if we delete your account on the SSO.

We process this personal data according to your consent. You can withdraw that consent at any time by unsubscribing from the SSO. You can unsubscribe by sending an e-mail to [marketing@zehnder.be](mailto:marketing@zehnder.be)

##### **4.7.1. The Partner for Life program**

If you take part in the Partner for Life program, we will process the data mentioned in Section 4.7. When registering products under the Partner for Life program, we will also process the following data: the serial number of the product and its installation date. We also process the data obtained during registration for commercial purposes, including the targeted stimulation of sales, promotion of events and invitations to loyalty programs. Finally, we process certain data related to your participation in the Partner for Life program, such as the training courses you have followed and how many points you have saved.

We process the above data under the Partner for Life program for implementing the agreement that we conclude with you.

We will use the data that we process for the Partner for Life program for as long as you actively participate in the program. If you have actively opted out of the SSO, we will delete the data within 30 (thirty) days. Finally, we will delete the data, on the basis of the applicable user conditions, if we have definitively terminated your access to the Partner for Life Environment.

##### **4.7.2. E-learnings**

If you use one or more E-Learning(s), we will record which E-Learnings you have followed and at which times.

### **4.7.3. The Zehnder Academy**

When you register for the Zehnder Academy, we will record which training course you have registered for and whether you have actually followed it.

### **4.8. Services**

When you conclude a contract for a service via our website, as a consumer or installer, you will be asked for your personal data and address details for registration. We process the above-mentioned data for the execution of an agreement so that we can provide you with the services we offer. We will use this data for as long as the service contract runs.

### **4.9. Administrative purposes**

When you place an order with us, we process all the data we need in order to deliver your order. This concerns both the exchange of correspondence between you and Zehnder about the order and all the documentation needed for delivering the order, such as order confirmation, invoice, consignment notes, etc. This documentation sometimes contains personal data.

We process this data for the fulfilment of an agreement so that we can provide you with the services we offer. In addition, we process the data to comply with our legal (administrative) obligations.

We then archive the data during the statutory retention periods for financial data. In many cases this term is 7 (seven) years, in some cases 10 (ten) years.

### **4.10. Cookies on our website and in our newsletters**

Our website and newsletters make use of cookies. These are small text files that are stored on your computer and can be retrieved from it. We use different types of cookies. Below we first explain the various types of cookies we use on our website. We then give an overview of all the cookies on our website, according to type. The purpose and retention period of each cookie are stated in the overview.

#### **4.10.1. Functional cookies**

Our website makes use of 'functional' cookies. These cookies are needed to allow the website to function correctly. We use these cookies to let you navigate around the website, to enable access to secure areas of our website and to store user settings and preferences such as language and browser settings.

#### **4.10.2. Analytical cookies**

To determine which parts of our website are most interesting for our visitors, we continuously measure how many of them come to our website and what they look at the most. The information we collect in this way is used to compile statistics. These statistics show us how often our website is visited, where exactly visitors spend the most time, and so on. This lets us to make the structure, navigation and content of the website as user-friendly as possible. We do not link the statistics and other reports back to individuals.

### 4.10.3. Other cookies

Our website contains cookies to track visitors as they visit different websites in order to display more relevant information. These are also called tracking cookies. We only use these cookies if you have given permission for this. You can change or withdraw your consent at any time via the cookie statement on our website.

### 4.10.4. Browser settings

If you do not want websites to put cookies on your computer at all, you can adjust your browser settings so that you receive a warning before cookies are installed. You can also configure the settings so that your browser rejects all cookies or only the cookies of third parties. You can also delete cookies that have already been installed. Be sure to adjust the settings separately for each browser and computer you use.

Please note that if you do not want cookies, we can no longer guarantee that our website will work correctly. Some functions of the website may be lost or you may not be able to see certain websites at all. In addition, refusing cookies does not mean that you will no longer see advertisements. The advertisements are then no longer tailored to your interests and are repeated more often.

How you can adjust your settings depends on the browser you use. If necessary, consult the help function of your browser.

### 4.10.5. Cookie overview

For the cookie overview, we refer you to our online overview [Privacy statement](#).

## 4.11. Social media plug-ins

The Social Media Plug-ins we use are shown in the table below. For the plug-in supplier to receive the information you have requested from the corresponding website of our online offer, you must click the marked plug-in field to activate it. In addition, the data collected by the functional cookies is then forwarded.

The plug-in supplier stores the data collected about you as user profiles and uses it for advertising, market research and/or to better tailor the design of its website to the needs of its users. We have no influence on the collected data and processing procedures of the plug-in supplier. These are subject to the privacy statement of the individual plug-in supplier. You can learn more about the purpose and scope of data collection and processing by the plug-in supplier in the privacy statements of these suppliers (below).

Plug-in	Supplier	Privacy statement
YouTube Content	Google LLC	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Xing Share	Xing SE	<a href="http://www.xing.com/privacy">http://www.xing.com/privacy</a>
Facebook Content/Share	Facebook Inc	<a href="https://www.facebook.com/about/privacy/update">https://www.facebook.com/about/privacy/update</a>

Google+ Content/Share	Google LLC	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Twitter Content/Share	Twitter Inc	<a href="https://twitter.com/privacy">https://twitter.com/privacy</a>
LinkedIn Content/Share	LinkedIn Corporation	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>
Pinterest Share	Pinterest Inc	<a href="https://policy.pinterest.com/en/privacy-policy">https://policy.pinterest.com/en/privacy-policy</a>
WhatsApp Share	WhatsApp Inc	<a href="https://www.whatsapp.com/legal?eea=1#privacy-policy">https://www.whatsapp.com/legal?eea=1#privacy-policy</a>

## 5. Which third parties have access to your data?

In certain cases, we may share your personal data with subcontractors (including processors as referred to in the EU General Data Protection Regulation) that we engage to carry out specific work we cannot perform ourselves.

Where this concerns processors (such as a hosting provider), we have concluded processing agreements with these parties so that they meet Zehnder's requirements.

Where this concerns parties who are themselves data controllers, as is the case, for example, when we engage an installer to investigate or resolve a warranty claim, we stipulate that the same party will handle your data with all due care and attention.

If we are legally obliged to do so, we also share your personal data with superintendents and investigative authorities or the tax office.

### 5.1. International transfer

Our subcontractors and companies within the group can be located outside the EU and/or EEA as well as inside it.

We will only transfer your personal data to subcontractors and same-group companies located in countries outside the EU and EEA if those countries provide an appropriate level of protection or if there is another appropriate guarantee in the form of a model contract established by the European Commission to protect your personal data.

If we transfer your personal data outside the EU and EEA on the basis of such a model contract, you can obtain a copy of the relevant model contract from us, whereby we may make certain information unreadable for confidentiality reasons.

## 6. How do we protect your data and how long do we keep it?

We take all the technical and organizational measures required to ensure that your personal data is properly secured and thus protected against unauthorized or unlawful use, modification, unauthorized access or disclosure, unintentional or unlawful destruction and loss.

We keep your data for processing only as long as it is needed for the purposes described in this privacy statement and never longer than the periods as stated in this privacy statement for the various processing operations.

When a retention period has expired, your data will either be permanently deleted or anonymized so that it can no longer be traced back to you.

## **7. How can you invoke your legal rights?**

You can contact our service department and/ or send an e-mail to our data protection officer ([dataprotectionofficer.be@zehndergroup.com](mailto:dataprotectionofficer.be@zehndergroup.com)) to exercise rights granted under the applicable data protection laws and regulations, including the right (1) to access, (2) to rectification, (3) to erasure, (4) to restriction of processing of your data, (5) to transfer your data, and (6) to object to processing.

NB. In certain cases, we will ask you for additional information so that we can establish your identity.

Situations may arise in which we are entitled to deny or restrict the rights referred to in this section. In all cases, we carefully consider whether there is a reason to do so and will inform you accordingly.

For example, the right to access may be denied if this is necessary to protect the rights and freedoms of other persons, or the deletion of your personal data may be refused if it needs to be processed to comply with legal obligations. The right to data portability cannot be exercised if the personal data in question was not provided by you or if we did not process the data with your consent or for the fulfilment of an agreement.

You can always contact us if you have any questions, comments and/or complaints regarding this privacy statement. In the event of unresolved problems, you also have the right to submit a complaint to the supervisory authorities, namely the Autoriteit Persoonsgegevens (Data Protection Authority) with regard to the processing of personal data and the Autoriteit Consument & Markt (Netherlands Authority for Consumers and Markets) with regard to the use of cookies.

### **7.1. The right to inspection**

You can ask us whether we process your personal data and you can inspect this data by receiving a copy it. If we respond to your request to inspection, we will also provide you with additional information, such as the purpose of the processing, the categories of personal data concerned and other information that you need to exercise this right effectively. If you ask us for additional copies, we will charge a reasonable fee based on the administrative costs incurred. Your request will be processed as soon as possible and no more than four weeks after receipt of the request.

### **7.2. The right to rectification**

You have the right to rectify your data if it is incorrect or incomplete. At your request, we will correct inaccurate personal data about you and complete incomplete personal data, taking into account the purposes for which they are processed (this may involve issuing an additional statement).

### **7.3. Right to erasure**

You have the right to have your personal data erased. This means that we delete your personal data and, to the extent possible, ensure that other data controllers we have shared your data with do the same.

Furthermore, your personal data will only be deleted in certain cases prescribed by law, which are given in Art. 17 of the EU General Data Processing Regulation GDPR.

Due to the way we set up certain services, it may take some time before backups are also deleted.

However, you should be aware that if you object us processing your personal data, or request its deletion, we may no longer be able to (fully) fulfil our obligations towards you.

### **7.4. The right to restrict processing**

You have the right to restrict the processing of your personal data in the following cases:

1. You contest the accuracy of the personal data (for a period that enables us to check the accuracy of the personal data).
2. The processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead.
3. We no longer need the personal data for processing purposes, but you need it for the establishment, exercise or substantiation of a legal claim.
4. You have objected to the processing pursuant to Article 21, Subsection 1 of the EU General Data Protection Regulation pending verification of whether our legitimate grounds override yours.

This right does not prevent us from continuing to store your personal data. You will be notified before the restriction is lifted.

### **7.5. The right to data portability**

The right to data portability means that you have the right to obtain the personal data concerning you, if technically possible, in a structured, commonly used and machine-readable format and to transfer it to another data controller. Upon request, and if technically possible, your personal data will be transferred by us directly to the other data controller.

You only have this right insofar as it concerns personal data that you have provided to us yourself and that we process on the basis of your consent or for the fulfilment of an agreement.

### **7.6. The right to object**

You have the right to object to the processing of your personal data. This means that you can ask us to keep and use your personal data. This only applies if 'legitimate interests' (including profiling) form the legal basis for the processing (see Section 7.3).

If your personal data is processed for direct marketing purposes, including profiling, and insofar as such profiling is related to direct marketing, you have the right to object at any time and free of charge. If you exercise this right, your personal data will no longer be processed by us for this purpose.

However, you should be aware that if you object to us processing your personal data, or request its deletion, we may no longer be able to (fully) fulfil our obligations towards you.

## 7.7. Questions

We take your privacy seriously. If you have specific questions or comments about your rights, it is best to contact us by sending an e-mail to [dataprotectionofficer.be@zehndergroup.com](mailto:dataprotectionofficer.be@zehndergroup.com)

You can naturally also communicate with us by post at the following address:

Zehnder Group Belgium nv/sa  
Attn. Data Protection Officer  
Wayenborgstraat 21  
2800 Mechelen  
Belgium

## 8. Version

This privacy statement was last amended in **February 2023** and replaces previous versions. We may amend this privacy statement from time to time. We will notify you of any changes before they take effect by posting the revised version of this statement on our websites.