

Privacy policy GBT Europe BV

<https://refleksheaters.eu>

About our privacy policy

GBT Europe BV cares greatly about your privacy. We exclusively process data that we need for (improving) our services, and carefully handle all information gathered about you and your usage of our services. Your data is not shared with third parties for commercial goals. This privacy policy applies to the use of the website and the services provided by GBT Europe BV. The starting date for the validity of these terms and conditions is 20/01/2021, with the publication of a new version the validity of all previous versions is canceled. This privacy policy describes what information about you is collected by us, what this data is used for and with whom and under what conditions this data could be shared with third parties. We also explain to you how we store your data, how we protect your data against misuse and what rights you have regarding the personal data you provide us.

If you have any questions about our privacy policy, please contact our privacy contact person, you will find the contact details at the end of our privacy policy.

About our data processing

Below you can read how we process your data, where we save it, what security techniques we use and to whom the data is visible.

Webshopsoftware

WooCommerce

We use webhosting and email services provided by WooCommerce. For our webhosting we use the services of Siteground. Personal data gathered with the use of our website and services is shared with Siteground requires access to these details to offer (technical) support. They will not use this data for any other purposes. Siteground has an obligation, based on the agreement we have with them, to take necessary precautions and security measures when it comes to your personal data.

WooCommerce and Siteground

Our webshop has been developed using WooCommerce software. We have chosen Siteground for our web hosting. Personal data that you make available to us for our services is shared with this party. Siteground has access to your data to provide us with (technical) support, they will never use your data for any other purpose. Siteground is obliged by the agreement we have with them to take appropriate security measures. These security measures consist of the application of SSL-encryption and a strong password policy. Regular backups are made to prevent loss of data.

Webhosting

Siteground

We purchase web hosting and e-mail services from Siteground. Siteground processes personal data on our behalf and does not use your data for its own purposes. They may, however, collect metadata about the use of the services. This is not personal data. Siteground has taken appropriate technical and organizational measures to prevent the loss and unauthorized use of your personal data. Siteground is obligated to maintain confidentiality pursuant to the agreement.

E-mail and mailinglists

MailChimp

We use the email services of MailChimp, a third party that facilitates our websites email-traffic and possible newsletters. Any confirmation email you receive from our website and webforms are sent to you from the servers of MailChimp. MailChimp will not use your name and email address for their own purposes. At the bottom of each automated email sent from our website you will find an `unsubscribe` link. When you click on this link you will no longer receive automated emails from our website, note that this can affect the functionality of our website greatly. Your personal data will be securely stored, sent and locked by MailChimp. MailChimp uses cookies and other internet technologies that track if emails are opened and read. Additionally, MailChimp gathers information about you as a receiver and the subjects of these emails with the purpose of improving the quality of their service, this data is stored for 30 days. MailChimp retains the right to use your personal information to further improve their services and, within this context, share it with third parties.

Siteground

We use the services of Siteground for our regular business e-mail traffic. Siteground has appropriate technical and organizational measures in place to protect against the misuse, loss and corruption of your and our information. Siteground has no access to our mailbox and we treat all e-mail traffic as confidential.

Payment processors

MultiSafepay

For concluding and processing (part of) our payments in our webshop we use the payment provider MultiSafepay. MultiSafepay processes your name, address and residence information. They also process payment information such as your bank account number or credit card number. MultiSafepay has implemented fitting technical and organizational measures to protect your personal data. MultiSafepay retains the right to use your personal (anonymized) information to further improve their services and, within this context, share it with third parties. All of the aforementioned guarantees in regard to the protection of your personal data are also applicable to any services by MultiSafepay that uses third parties. MultiSafepay does not store your data any longer than the instalments permitted by the appropriate legal grounds.

Reviews

Trustpilot

We collect reviews via the Trustpilot platform. If you leave a review through Trustpilot, you will be asked to enter your name, place of residence and e-mail address. Trustpilot shares this information with us so that we can link the review to your order. Trustpilot also publishes your name and place of residence on its own website. In some cases,

Trustpilot may contact you to explain your review. If we invite you to leave a review, we will share your name and e-mail address with Trustpilot. They will only use this data for the purpose of inviting you to leave a review. Trustpilot has taken appropriate technical and organizational measures to protect your personal data. Trustpilot reserves the right to use third parties in order to provide its services; we have given Trustpilot permission to do so. All of the above guarantees concerning the protection of your personal data also apply to those parts of the service provision, for which Trustpilot uses third parties.

Transport and logistics

PACKS (Netherlands and Belgium)

When you place an order with us, it is our job to deliver your package to you. We use the services of PACKS to execute the deliveries. It is therefore necessary that we share your name, address and place of residence with PACKS. PACKS use this data only for the purpose of executing the contract. In the event that PACKS hire subcontractors, PACKS also make your data available to these parties.

GLS (Europe)

If you place an order with us, it is our task to deliver your package to you. We use the services of GLS to execute the deliveries in Europe, with the exception of The Netherlands and Belgium. It is therefore necessary that we share your name, address and residence details with GLS. GLS only uses this data for the execution of the agreement. In the event that GLS engages subcontractors, GLS will also make your data available to these parties.

Accounting and Bookkeeping

Exact

To keep our records and accounts we use the services of Exact. We share your name, address and details regarding your order. These details are used for the administration of sales invoices. Your personal data are transmitted and stored securely. Exact is required to maintain confidentiality of your personal data. Exact does not use your personal data for any purpose other than those described above.

Purpose of data processing

General purpose of data processing

We use your data with the sole purpose of providing you with our services. This means that the goal of processing this data stands in direct relation to the assignment or task that you offer us. We do not use this data for (addressed) marketing purposes. If you share information with us and we use this information to - not based on a request - contact you at a later time, we will first ask for explicit consent. Your data is not shared with third parties, with any other purpose than to fulfil accountancy and administrative obligations. These third parties are all obligated to a duty of confidentiality based on the agreement we have with them, an oath or legal obligation.

Automatically collected data

Information automatically gathered by our website is processed with the sole purpose of providing you with and/or to further improve our services. This information (for instance

your IP address (anonymized), web browser and operating system) is not personal information.

Cooperation in tax and criminal investigation

In some cases, we may be obligated by government to a lawful duty of sharing your information with the purpose of assisting in a fiscal or criminal investigation. In such cases we are forced to comply and assist, but will, based on lawful possibilities, offer objection.

Retention periods

We store your data for as long as you are a client with us. This means that we maintain and keep your client profile until you make it known to us that you no longer desire to use our services. Such a message also functions as a request to be forgotten. We are required to keep invoices with your (personal) information due to relevant administrative obligations, this information is safely stored for as long as the relevant term for these obligations has not yet passed. Personnel no longer has access to your client profile and any documents made because of your assignment or task.

Your rights

Based on valid Dutch and European law you, as a concerning party, have certain rights when it comes to personal data that is processed by or on behalf of us. Below you may find an explanation of these rights and how you, as a concerning party, can invoke these rights. In principle to prevent abuse we only send invoices and copies of your data to e-mail addresses that you have made known to us. Should you wish to receive this data on another e-mail address or for instance per mail we will ask you to identify yourself accordingly. We maintain an administration of concluded requests, in case of a request to be forgotten we will maintain an administration of anonymized data. You receive all invoices and copies of data in files that are structured in a machine-readable format Based on data classifications that we use within our system. At all times you maintain the right to lodge a complaint with "Autoriteit Persoonsgegevens" (Dutch organization) if you suspect that we mistreat or misuse your personal data.

Right of inspection

At all times you maintain the right to view the data we process that has a relation or may be reducible to your person. You may request such a viewing to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved, we will send you, via the e-mail address known to us, a copy of all data with an added overview of processors managing this data while also mentioning the categories under which we store this data.

Right to rectification

At all times you maintain the right to have the data we process that has a relation or may be reducible to your person be adjusted. You may request such an adjustment to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved, we will send you, via the e-mail address known to us, a confirmation that the data has been adjusted.

Right to restriction of processing

At all times you maintain the right to limit the data we process that has a relation or may be reducible to your person. You may request such limiting to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved, we will send you, via the e-mail address known to us, a confirmation that the processing of your data is limited until you chose to cancel said limitation.

Right of transferability

At all times you maintain the right to request for the data we process that has a relation or may be reducible to your person be processed by a third party of choice. You may send in such a request to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved, we will send you, via the e-mail address known to us, your (personal) invoices or copies of data that we, or third parties on behalf of us, have processed. It is highly likely that in such a case we can no longer offer our services to you for we can no longer guarantee the previous data safety.

Right of objection and other rights

At all times you maintain the right to object to the processing done by us, or on behalf of us by third parties, of your personal data. In case of such an objection we will immediately cease all processing of your data while your objection is being investigated and handled. In case of a justified objection, we will return all invoices and/or copies of personal data that we, or third parties on behalf of us, have processed up until that point and cease processing thereafter. You also maintain the right to not be subject of automated decision-making processes or profiling. We process your data in such a way that this right does not apply. Should you believe that this right does apply then we ask you to reach out to our contact in charge of privacy matters.

Cookies

Google Analytics

Through our website, cookies are placed by the American company Google, as part of the "Analytics" service. We use this service to track and get reports about how visitors use the website. This processor may be obliged under applicable laws and regulations to provide access to these data. We have not authorized Google to use the analytics information obtained for other Google services.

Cookies from third parties

In the event that third-party software solutions make use of cookies, this will be stated in this privacy statement.

Privacy policy changes

At all times we maintain the right to alter our privacy policy. This page however always displays the most recent version of our privacy policy. Should a new privacy policy have consequences for the ways in which we process recently gathered data in regard to your person, then we will notify you of this via e-mail.

Company details

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