

Actenzo Privacy Policy

Version 1.1

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Introduction

At Actenzo, we respect your need for online privacy and protect any Personal Information that you may share with us in an appropriate manner. Our practice with respect to the use of your Personal Information is explained in this Privacy Policy ("Privacy Policy"). This Privacy Policy is in compliance with the EU General Data Protection Regulation.

The Actenzo website and online application (hereafter referred to as the "Service" or "Services") are owned and operated by Actenzo BV, a Dutch registered company at the Dutch Chamber of Commerce with number 84818271 located at Cargadoorskade 16, 3071 AW Rotterdam, the Netherlands, acting under the trading name Actenzo (hereafter referred to as "Actenzo", "we" or "us"), in accordance with this Privacy Policy.

Privacy settings

1. This document informs you of our policies regarding the collection, use and disclosure of Personal Information when using the Service. We will not share your information with anyone except as described in this Privacy Policy.
2. We use your Personal Information for providing and improving the Service. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at the Service.
3. We also process Personal Information on behalf of our customers in the context of supporting the Service. Where a customer subscribes to our Service for their online store, system or platform, they are able to retrieve Personal Information from consumers and/or businesses from their account(s) at online Marketplaces or Platforms as, but not limited to, Vivino and Drinks&Co. We do not store this Personal Information, as laid out in the Data Processing Agreement we have with our customers.

Information collection

4. While using our Service, we may gather or ask you to provide us with certain personally identifiable information that can be used to contact, identify and invoice you. Personally identifiable information may include, but is not limited to, your email address, name, phone number, postal address, bank account number, and other information ("Personal Information").
5. We may also collect information that your browser sends whenever you visit our Service ("Log Data"). This Log Data may include information such as your computer's 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 and other statistics.
6. In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase our Service's functionality. These third party service providers have their own privacy policies addressing how they use such information.

Information use

7. The personal information we collect from you may be used in one of the following ways:
 - To deal with your inquiries and requests
 - To create and administer records about any online account that you register with us
 - To provide you with information and access to resources that you have requested from us.

- To provide you with technical support (your information helps us to better respond to your individual needs)
- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you), including to improve the navigation and content of our sites
- For website and system administration and security
- For general business purposes, including to improve customer service (your information helps us to more effectively respond to your customer service requests and support needs), to help us improve the content and functionality of our Service, to better understand our users, to protect against wrongdoing, to enforce our Terms and Conditions, and to generally manage our business
- To process transactions and to provide Services to our customers
- For recruitment purposes, where you apply for a job with us
- To administer a contest, promotion, survey, or other site features
- To improve advertising campaigns, primarily in an effort to prevent targeting of impressions via third-party channels when they are not relevant
- To send e-mails, both either periodic or one off. The e-mail addresses you provide for invoicing or support questions will be used to send you information regarding payments, invoicing or answers to your questions as well as proactively for important updates of our service. When it is in accordance with your marketing preferences, we will send occasional marketing e-mails about our Service, which you can unsubscribe from at any time using the link provided in the message.

Cookies

8. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. We use cookies to collect information. 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.

Service providers

9. We employ third party companies and individuals (“Third Parties”) to facilitate our Service, 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 Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. We will only share your information with third parties in certain circumstances:

- We engage certain trusted third parties to perform functions and provide services to us, including cloud hosting services, off-site backups, email service providers, and customer support providers. We will only share your Personal Information with third parties to the extent necessary to perform these functions, in accordance with the purposes set out in this Privacy Policy and applicable laws.
- In the event of a corporate sale, merger, reorganization, dissolution, or similar event, your Personal Information may be sold, disposed of, transferred, or otherwise disclosed as part of that transaction.
- We may also disclose information about you to third parties where we believe it necessary or appropriate under law, for example: (1) to protect or defend our rights, interests, or property or that of third parties; (2) to comply with legal process, judicial orders, or subpoenas; (3) to respond to requests from public or government authorities, including for national security and law enforcement purposes; (4) to prevent or investigate possible wrongdoing in connection with the Services or to enforce our Terms of Service; (5) to protect the vital interests of our users, customers, and other third parties.



- We may use and share aggregated non-personal information with third parties for marketing, advertising, and analytics purposes.

We do not sell or trade your Personal Information to third parties.

Security measures and protection

10. The security of your Personal Information is important to us. No method of transmission over the Internet, or method of electronic storage is 100% secure. However, Actenzo in its sole discretion undertakes certain security measures aimed at protecting against unauthorized access, alteration, disclosure or destruction of Personal Information. It is your responsibility to safeguard your password and login details. If you know or suspect that your password is known to others, please contact us so we can take immediate measures. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

11. We implement a variety of security measures to maintain the safety of your personal information when you enter, submit or access your Personal Information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology.

International data transfer

12. Your information, including Personal Information, 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 from those of your jurisdiction. Please note that we transfer the information, including Personal Information, to servers in the European Union to store and process it there. Non-personal information that is used by our Service can be stored in various locations including, without limitations, other EU countries, the United States of America or Asia.

Third Party Links

13. The Service may contain links to or allow you to interact with and make use of other independent third-party websites, products or services ("Third-Party Services"). Access to Third-Party Services is provided solely as a convenience. Third-Party Services are not under Actenzo's control and Actenzo does not necessarily endorse the content, advertising, products, services or other materials on or available from such Third-Party Services. Your use of any Third-Party Services may be subject to the third-party provider's terms and conditions and privacy policy and may involve the disclosure or transfer of information from or about you to the third-party provider. You will need to make your own independent judgment regarding your use of and interaction with any Third-Party Services. You acknowledge and agree that Actenzo is not responsible for the availability of any Third-Party Services and that Actenzo shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with you use of or interaction with any Third-Party Services.

Children's privacy

14. Our Service does not address anyone under the age of 18 ("Children or Child"). We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you are aware that your Child has provided us with Personal Information, please contact us. If we become aware that we have collected Personal Information from a Child, we take steps to remove that information from our servers.

Data retention

15. We may retain your personal information as long as you continue to use the Services, have an

account with us, or for as long as is necessary to fulfil the purposes outlined in the policy. You can ask to close your account by contacting us at the details above, and we will delete your personal information on request. We may, however, retain personal information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

Changes

16. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy in the Service as well as on our website.

17. This Privacy Policy and any renewal and/or modification thereof shall be governed by and construed in accordance with the laws of the Netherlands. Any dispute or difference arising out of or in connection with this Privacy Policy shall be the exclusive jurisdiction of the Dutch courts.

Your privacy rights

You have the following rights in respect of the processing of your personal data by us when we act as the data controller for the processing of your personal data. Please note that where we act as a data processor for our customers, you can exercise your rights at the respective customer.

- the right to request whether we process your personal data and if so, the right to access your personal data and to receive information about the processing of your personal data;
- the right to rectification of your personal data if these are incorrect or incomplete;
- the right to have your personal data deleted ('right to be forgotten');
- the right to object to the processing of your personal data or to limit the processing of your personal data;
- the right to withdraw your consent for the processing of your personal data, if the processing is based on your consent;
- the right to receive or surrender your personal data to a third party appointed by you in a structured, customary and machine-readable form ('right to data portability').

We do not use automated decision-making within the meaning of Article 22 GDPR.

To exercise your rights, you can contact us via privacy@actenzo.com or via the address mentioned in the introduction. In order to prevent that we disclose information to the wrong person, we can ask you for additional information to verify your identity. In principle, we will inform you of whether we can comply with your request, within one month after receipt. In specific cases, for example when it concerns a complex request, this term may be extended by two months. We will inform you of such an extension within one month after receiving your request. On the basis of the applicable privacy legislation, we can refuse your request under certain circumstances. If this is the case, we will explain to you why. You can find more information about your privacy rights on the website of the Dutch Data Protection Authority.

Complaints

If you have a complaint about the processing of your personal data by us, we will be happy to work together to find a solution. If this does not lead to the desired result, you will have the right to file a complaint with the competent supervisory authority. In the Netherlands, this is the Dutch Data Protection Authority. If you live or work in another country of the European Union, you can file a complaint with the supervisory authority of that country.