

NETHERLED®

Privacy Policy Statement

NetherLED - Serutrade International Light B.V. (referred to as “NetherLED”) is committed to keeping the personal information of its customers accurate, confidential, secure and private. Our Privacy Policy has been designed to inform employees, customers, and third parties of NetherLED of our commitment and recognition to our obligation to meet the spirit and terms of the federal General Data Protection Regulation (GDPR).

Contents

Our Privacy Policy describes the principles by which NetherLED protects the privacy of personal information in its possession. It addresses the reasons why such information is collected, how it is used, how its confidentiality is protected and outlines the customers’ rights in respect of this information.

The Privacy Policy applies to personal information about the customers of NetherLED and other individuals that is collected, used or disclosed by NetherLED.

Personal Information Protection Principles

1. Accountability

NetherLED is accountable for the protection of all personal information within the organization's possession or control, including any personal information that has been transferred to a third party for regulatory, legal or processing purposes. NetherLED will require a comparable level of protection of this information from its third party relations.

NetherLED has established a Privacy Office, which has overall responsibility for our protection of personal information and for NetherLED’s compliance with this Privacy Policy.

2. Identifying Purposes

Personal information that NetherLED collects from customers includes:

- company and employee name and address and other contact information, such as telephone numbers, email address;
- information about a customer’s transactions with us, such as account numbers and payment history;
- bank information for payments.

When an individual applies for product and/or service, NetherLED will make the individual aware of the purposes for which NetherLED is requesting the personal information. If NetherLED identifies other purposes for which the personal information may be used, NetherLED will seek the individual's consent prior to such use. NetherLED will advise that it is the individual's right to refuse permission for NetherLED to use personal information for any new purposes.

Additional purposes for collecting personal information may be identified to an individual before or at the time of collection. However, at a minimum NetherLED will collect personal information for the following purposes:

NETHERLED®

- To verify the customer's identity;
- To determine the customer's eligibility for products or services;
- To provide the customer with lighting service and to bill the customer for that service;
- To assist us in updating the customer's creditworthiness and the collection of accounts;
- To respond to the customer's inquiries about quotes;
- To prevent fraud with respect to both the customer and our company;
- To meet legal, regulatory and settlement requirements.

3. Consent

The knowledge and consent of an individual are generally required for the collection, use or disclosure of personal information and NetherLED will seek to obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly or implicitly. However, NetherLED will collect, use or disclose personal information without an individual's knowledge and consent only in limited circumstances and as permitted by law. Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time.

All existing customers will be informed of what types of personal information have been collected, the purpose for the collection and the procedures available for contacting NetherLED with any inquiries. All new customers will be provided with a consent form and an accompanying explanation about the collection, use and disclosure of their personal information when requesting service.

4. Limiting Collection

NetherLED limits the amount and type of personal information it collects to that which is necessary for the business of the utility and as permitted by law. Each affiliate of NetherLED will be responsible for its own collection, use and disclosure of information. Personal Information will be collected using procedures that are fair, transparent and lawful.

5. Limiting Use, Disclosure and Retention

NetherLED will only use the personal information for the purpose for which it was collected as identified in principle #2, unless consent is given by the individual to use or disclose it for another purpose or as is required by law. NetherLED will develop explicit retention periods for closed accounts, after which the personal information will be destroyed or made anonymous. Under certain exceptional circumstances, NetherLED may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

6. Accuracy

NetherLED shall take all reasonable steps to ensure that all personal information will be kept accurate, complete and up to date.

Individuals may challenge the accuracy and completeness of personal information about them and have it amended, as appropriate.

NETHERLED®

7. Safeguards

In executing its responsibilities with respect to the confidentiality of personal information, NetherLED will employ a number of safeguards, appropriate to the sensitivity of the information, to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Such safeguards will include physical measures, organizational measures and technological measures, for example locked filing cabinets, restricted access to offices, security clearances, limiting access on a “need to know” basis and the use of passwords and encryption. Procedures for implementing these measures will be communicated to all employees and third parties to ensure compliance with this principle.

8. Openness

NetherLED will make its policies and practices relating to the protection of personal information available to its customers. NetherLED will keep its customers informed of these policies and practices and customers shall be provided access to all related policies and procedures via NetherLED's web page and bill inserts. The information will be available in a format that is easy to understand.

9. Individual Access

Any customer of NetherLED can have access to the personal information about them that NetherLED has in its possession or control. Any customer may request that their personal information be amended for purposes of accuracy and completeness.

Customers can make their requests by telephone (+31 43 3100 293), via email (info@netherled.com) or in writing (, P.O. Box 64, 6200 AB Maastricht, The Netherlands, Attention: Privacy Officer). Response to an individual's request will be made in a timely and efficient manner.

10. Challenging Compliance

Any customer of NetherLED may challenge NetherLED's compliance with this Privacy Policy by contacting NetherLED directly. NetherLED has policies and procedures to receive, investigate and respond to individuals' complaints and questions.