

## **PRIVACY STATEMENT – VAN CAEM KLERKS GROUP**

### **1. INTRODUCTION**

- 1.1 This Privacy Statement is based on the European General Data Protection Regulation (which replaces the Data Protection Directive 95/46/EC) (“**the GDPR**”), the Dutch “*Algemene Verordening Gegevensbescherming*” (“**the AVG**”) and all associated legislation as issued by the legislation authorities.
- 1.2 This Privacy Statement sets out the basis on which any personal data VCKG Holding B.V. (registered at the Dutch Trade Register under no. 854527953), VCF Holding B.V. (registered at the Dutch Trade Register under no. 68443633), Van Caem Oriental Holding Ltd. (registered at the Trade Register in Cyprus under no. HE 378286), VCW B.V. (registered at the Dutch Trade Register under no. 64796833), VCLX N.V. (registered at the Curacao Commercial Register under no. 13824) and any of their direct and indirect subsidiaries (collectively, “**the Group**”, “us”, “we” or “our”) processes from a client and/or prospective client, business partners and/or other contracting parties (hereinafter collectively referred to as “**Client**”), or that the Client provides to the Group, will be disclosed, used and/or processed by the Group.
- 1.3 The services of the Group to the Client include all offers by, and agreements with, any part of the Group which are made available on our website <https://www.caemklerks.com> (the “**Website**”), relating to the sale & purchase of goods (the “**Services**”).
- 1.4 By visiting or using the Website and/or using any of the Services of the Group, the Client is deemed to agree to the terms of this Privacy Statement. Please review this Privacy Statement carefully prior to visiting the Website, using the Services or otherwise providing any personal data.
- 1.5 If the Client wishes to amend or remove any personal data in the Group’s possession, or exercise any other rights as stipulated in the GDPR, it may refer to the paragraph titled “Amendments to Personal Data, Opt Out & Other GDPR Rights” below for the required procedure.

### **2. PERSONAL DATA**

- 2.1 Personal data means any information relating to an individual who can be identified from either that particular information, or from that information and other information which the Group has or is likely to have access to. Such personal data refers to data which is already in the Group’s possession or the data to be collected by the Group. This Privacy Statement supplements but does not supersede nor replace any other consent that the Client may have previously provided to the Group, nor does it affect any right that the Group may have in connection to – or as legal base to – process the Client’s personal data.
- 2.2 The Group processes personal data for the purpose to provide the Services, that is necessary for compliance with a legal obligation or that is necessary for the purposes of the legitimate interests of the Group.
- 2.3 Personal data may include the contact person’s name, email and telephone number, details of any correspondence, queries, or any other forms communication (i.e. telephone, email etc.) the Client makes with the Group regarding the Services.
- 2.4 If you authorised the Group to collect your personal data and want to stop us from doing so, you are of course free to instruct us accordingly and withdraw your authorisation. Please refer in this regard to the paragraph entitled “Amendments to Personal Data, Opt Out & Other GDPR Rights” below for the required procedure.

### **3. USE OF COOKIES**

- 3.1 The Website uses data collection devices such as “cookies”. The Website uses 3 different cookies: (i) Wordpress, (ii) Wordfence, and (iii) Google Analytics. Wordpress and Wordfence ensure that the Website is working properly. With Google Analytics we can monitor how many persons have visited our Website.

### **4. USE OF PERSONAL DATA**

#### **4.1 Processing your personal data**

- 4.1.1 The Group processes personal data from existing and prospective clients for various reasons. Any personal data will not be further processed in a manner that is incompatible with the purpose as stated before processing, for the performance of the Services, to comply with a legal obligation or as necessary for the purposes of the legitimate interests of the Group.

- 4.1.2 Where the Group processes personal data, the Group will not store it for longer than is necessary to fulfill that purpose, unless we have to keep it for the legitimate interests of the Group or other legal reasons.

#### **4.2 Sharing your personal data**

- 4.2.1 The Group takes securing your personal data and preserving your privacy very seriously. Your personal data is managed, secured and controlled by the Group’s IT-department. The Group can share your personal data with third parties if this is necessary for the performance of the contract. If it does so, the Group will stipulate legally lawful conditions with these third parties to protect your personal data. The Group will never sell your personal data.

### **5. SECURITY**

- 5.1 The Group endeavours to take all reasonable steps to protect your personal data and to store it securely. Amongst others, all web traffic between your web browser and the Website uses the Secure Sockets Layer (SSL). In laymen’s terms: this traffic is encrypted. However, no method of transmission over the Internet or method of electronic storage is 100% secure. While security cannot be guaranteed, the Group strives to protect your personal data and is constantly reviewing and enhancing its security protocols to ensure that your personal data is not subject to unnecessary risks. In using the Services, you accept the inherent security implications of engaging in the Services and you agree that you will not hold the Group responsible for any breach of security unless we have been grossly negligent or in willful default.

### **6. AMENDMENTS TO PERSONAL DATA, OPT OUT & OTHER GDPR RIGHTS**

- 6.1 If you wish to:

- (a) access;
- (b) amend (including update or limit);
- (c) request rectification;
- (d) remove the personal data held by the Group (or wish to receive this data);
- (e) no longer share your personal data under this Privacy Statement; or
- (f) wish to exercise any other right(s) as stipulated in the GDPR

you may contact us anytime via the contact details as mentioned in Section 9 of this Privacy Statement.

## 7. RIGHTS TO AMEND THIS PRIVACY STATEMENT

- 7.1 The Group reserves the right to update this Privacy Statement at any time to take into account any changes in law or for any other reason. We encourage you to periodically review this page for the latest information on our privacy practices.
- 7.2 Your continued use of the Website and Services after any changes to this Privacy Statement constitutes your consent to any such changes, to the extent such consent is not otherwise provided. If there is a conflict between two versions of the Privacy Statement to which you have agreed or been deemed to agree, the more recent version shall take precedence unless it is expressly stated otherwise.

## 8. MISCELLANEOUS

### 8.1 Complaints

- 8.1.1 The Group aims to provide its Clients with the highest standard of service. However, in the rare occasions where our services have not met your expectations, please send an email to [privacy@caemklerks.com](mailto:privacy@caemklerks.com) or for complaints with regard to Van Caem Prestige to [privacy@prestigesupply.net](mailto:privacy@prestigesupply.net). You can also contact us by post via our contact details below. We will provide information on the taken action and we will provide you again with the highest standard of service. If you remain unsatisfied with our response in relation to privacy, you have the right to lodge a complaint at the “Autoriteit Persoonsgegevens”.
- 8.1.2 However, we encourage our Clients to lodge a complaint with the Group before lodging a complaint to the abovementioned authorities. We will always fully investigate your complaint.

### 8.2 Governing law and Jurisdiction

- 8.2.1 This Privacy Statement shall be governed by and construed in accordance with the laws of the Netherlands and you agree to submit to the exclusive jurisdiction of the courts in the Netherlands.

## 9. CONTACT US & GROUP DETAILS

If you wish to communicate with us about anything related to this Privacy Statement, you may contact us via:

### The Divisions:

Van Caem Liquour  
Van Caem Luxury and Lifestyle  
Klerks Fine Wines  
Van Caem Wholesale  
Van Caem Distribution

[privacy@caemklerks.com](mailto:privacy@caemklerks.com)

Danzigerkade 73  
1013 AP Amsterdam  
the Netherlands

### The Division:

Van Caem Prestige

[privacy@prestigesupply.net](mailto:privacy@prestigesupply.net)

Danzigerkade 73  
1013 AP Amsterdam  
the Netherlands