



## **Copaco Privacy Statement**

Last Revised: May 18, 2018

### **Purpose and Scope**

This Copaco Privacy Statement (the "Privacy Statement") explains how Copaco N.V. and companies that we own or control ("Affiliates") (collectively, "Copaco", "we", or "us") collect, use, store, process, disclose, and delete Personal Data (as defined in this Privacy Statement) you provide directly to us or that we receive from your authorized third parties. This Privacy Statement also outlines your rights in respect to your Personal Data.

Copaco is a distributor and reseller of IT products and services, headquartered in the Netherlands, with Affiliates in the Netherlands, Belgium and France.

### **1. General Principles for the Processing of Personal Data**

Personal Data will be collected, stored, processed and transmitted in accordance with Copaco's established policies and applicable federal, state, local and international laws, rules and regulations.

The principles of Copaco with respect to the processing of Personal Data are:

- (1) Personal Data will be processed fairly and lawfully;
- (2) Personal Data will be collected for specific, explicit, and legitimate purposes and not further processed for incompatible purposes;
- (3) Personal Data collected by Copaco will be adequate, relevant, and not excessive in relation to the purposes for which it is collected;
- (4) Personal Data collected by Copaco will be accurate and, when necessary, kept up to date as best we can;
- (5) Personal Data will be protected against unauthorized access and processing using appropriate technical and organizational security measures and controls; and
- (6) Personal Data collected by Copaco will be retained as identifiable data for no longer than necessary to serve the purposes for which the Personal Data was collected.

### **2. Collection of Information**

Copaco may collect Personal Data about you from a variety of sources, including, directly from you, from other Users, from resellers and distributors, from our vendors, from our service providers, from third party information providers, from our Affiliates, and through the operation of the Website.

Personal Data are defined as information which is directly or indirectly traceable to an individual.



"Personal Data" collected by Copaco includes:

- your first and last name;
- billing or shipping address;
- credit card or payment information;
- government issued identification number;
- email address;
- phone number;
- purchase information and history;
- your account number;
- resume or professional information; and
- a combination of your username and password used to access the Website.

Copaco collects your Personal Data as follows:

Information You Provide Voluntarily. We may collect Personal Data directly from you when you voluntarily provide it to us. For example, when you communicate with us over the telephone or through the Website by way of email, online chat, web form, or online account registration to obtain access to Offerings, register for an event or training, purchase an Offering, ask questions, attempt to resolve any issues related to the Website or Offerings, submit a job application, or submit feedback and comments.

Information We Collect Automatically. When you visit our Website, we may collect certain information automatically from your Device. In some countries, including countries in the European Economic Area, this information may be considered Personal Data under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, your Media Access Control (MAC) Address, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and Other Website Usage Information" below.

From Third Party Information Providers. Copaco may also obtain Personal Data from third parties that have obtained or collected information about you and that have the right to provide that Personal Data to us. Copaco will only obtain this Personal Data where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Data to us. For example, if you register for the Website using a third party service or through a third party website or service, the information you provide to that third party will be provided to us to establish your account on the Website. We may also contract third parties that are in the business of providing information to businesses such as ours to verify certain information about you or obtain information, such as credit insurers. We may use the Personal Data about you we receive from a third party outside of the Website in accordance with the terms we establish with that third party. We may also obtain Personal Data from publicly-available sources such as open government databases or other data in the public domain.

### 3. Cookies and Other Website Usage Information.

The Website also automatically monitors and collects information about how you access, use, and interact with the Website, through cookies.

A cookie is a small text file that is stored on a user's Device. Cookies allow us to collect information such as browser type, time spent on the Website, pages visited, and language preferences. We and our service providers use the information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using the Website.

Generally, the cookies that are used on the Website can be broken down in to the following categories:

- Strictly necessary cookies. These are cookies that are required for the operation of our Website. They include cookies that enable you to log into secure areas of our Website or use a shopping cart;
- Analytical/performance cookies. These cookies are used to analyze how the Website is used and to monitor its performance, which allows us to improve your experience in using the Website. These cookies help us to tailor the content of Website to reflect what users find most interesting and to identify technical issues in the Website. We may also use this data to compile reports to help us analyze how the Website is used, what most common issues are and how we can improve the Website;
- Functional/tracking cookies. These cookies enable us to recognize repeating visitors to our Websites. By matching an anonymous, randomly generated identifier, a tracking cookie keeps track of what site users come from, what search engine they may have used, what link they clicked on, what keyword they used and where they were in the world when they accessed the Website. By monitoring this data, we can make improvements to our Website.

Cookies can furthermore be divided in cookies that are used "in-session" each time you visit, (they expire when you leave the Website or shortly thereafter) and cookies that are saved for a fixed period, and will not be deleted when the browser is closed.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you prefer not to accept cookies, most browsers will allow you to:

- (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it;
- (ii) disable existing cookies; or
- (iii) set your browser to automatically reject any cookies. However, please be aware that if you disable or reject cookies, some features and services may not work properly because we may not be able to recognize and associate you with your account(s). In addition, the offerings we provide when you visit us may not be as relevant to you or tailored to your interests.



#### **4. Use of Information**

Copaco uses Personal Data we collect to operate our business and provide you with offerings, this includes improving our offerings and personalize your experiences. We also may use the data to communicate with you, for example, to inform you about your account and product information.

Copaco may use your Personal Data for a variety of purposes (the "Purposes"), including to:

- provide, maintain, and improve the Website and our offerings, including to operate certain features and functionality of the Website;
- understand user preferences to enhance users' experience with Copaco and its Affiliates, contractors, and business partners;
- research and analyze the effectiveness of the Website and the marketing, advertising and sales efforts of Copaco, its Affiliates, contractors, and business partners;
- collect account receivables owed by customers of Copaco;
- process orders and payments made through the Website;
- develop additional offerings;
- process job applications;
- comply with a legal obligation or respond to lawful requests by public authorities (including national security or law enforcement requirements);
- manage our everyday business needs;
- enforce compliance with our Terms of Use and applicable law;
- prosecute and/or defend a court, arbitration or similar legal proceedings;
- communicate with you by sending you newsletters, promotions and special offers or information about new products and services on an ongoing basis in accordance to your marketing preferences. You can unsubscribe from our marketing communications by clicking "Unsubscribe" at the bottom of the e-mail or by contacting us using the contact details below;
- communicate with you by phone to respond to customer service inquiries or comments through the Website, social media or otherwise, to discuss issues relating to your account or the Website, and to provide customer support;
- deliver advertising to you, including to help advertisers and publishers serve and manage ads on the Website or on third party sites, and to tailor ads based on your interests and browsing histories. Please see the section 'Cookies and Other Website Usage Information' for additional information related to such advertising and your related controls;
- compile aggregated statistics about the operation and use of our Website and to better understand the preferences of the visitors of our Website; and
- other Purposes: To carry out other legitimate business purposes, as well as other lawful purposes which we will notify you about.

#### **5. Information Sharing**

We share your Personal Data with your consent or if necessary, to complete any transaction or



provide offerings you have requested or authorized. We also share Personal Data with third party vendors, Affiliates and business units, when required by law or to respond to legal process, to protect our customers, to protect lives, to maintain the security of our offerings, and to protect the rights or property of Copaco.

We may disclose your Personal Data as follows:

Affiliates and Business Units. Copaco may share your Personal Data with our Affiliates, regardless of whether these entities share the Copaco brand. We may also share your Personal Data with other business units that offer products or services under the Copaco brand or one of our other brands. Our Affiliates and business units will use your Personal Data we share with them in accordance with this Privacy Statement.

Law Enforcement and Safety. Copaco may share your Personal Data with any competent law enforcement, regulatory, government agency, court, other governmental officials, or other third party when we believe disclosure is necessary:

- (i) as a matter of applicable law or regulation;
- (ii) to exercise, establish or defend our legal rights; or
- (iii) to protect your vital interests or those of any other person.

Sale or Acquisition of Assets. If Copaco transfers ownership or control of any portion of Copaco or the Website to an actual or potential buyer, whether it concerns an acquisition, merger, reorganization, or other disposition of all or any portion of our business, assets, or stock (whether because of bankruptcy or similar proceedings), we may transfer your Personal Data to that actual or potential buyer, provided that the use of your Personal Data by that third party remains subjected to applicable law.

## **6. Other Important Privacy Information**

Below you will find additional privacy information you may find important.

Security of Personal Data. Copaco uses appropriate technical and organization control and measures to secure and protect your Personal Data from unauthorized loss, misuse, and disclosure, such as strong user access controls, segmented network architecture, and comprehensive employee policies and training. Unfortunately, no data transmitted over or accessible through the internet can be guaranteed to be 100% secure. As a result, though Copaco attempts to protect all Personal Data, Copaco cannot ensure or guarantee that Personal Data will be completely secure from abuse by hackers or from other nefarious or criminal activities, or in the event of a failure of computer hardware, software, or a telecommunications network. Copaco will notify you in case we are aware of a security breach involving your personally identifiable information (as defined by the applicable foreign, federal, state, and local laws) stored by or for us, in accordance with applicable laws.

Legal Basis for Processing Personal Data. The legal basis for collecting and using the Personal Data information as described above relies on the Personal Data involved and the specific context in which we collect it.



However, we will normally collect Personal Data from you only:

- (i) in case we need the Personal Data to enter into a contract with you (such as to fulfill your purchase of an offering);
- (ii) in case the processing is in our legitimate interest and not overridden by your rights; or
- (iii) in case have your consent to do so. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

When we ask you to provide Personal Data to comply with a legal requirement or to enter into a contract with you, we will announce this at the relevant time and inform you whether the provision of your Personal Data is mandatory or not (together with possible consequences if you do not provide your Personal Data).

When we collect and use your Personal Data in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our platform and communicating with you, necessary to provide our services and offerings to you, and for our legitimate commercial interest. For instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests, and if applicable, we will inform you at the relevant time of what those legitimate interests are.

If you have any questions, or need further information concerning the legal basis on which we collect and use your Personal Data, please contact us using the contact details below.

Accuracy. It is your responsibility to provide Copaco with accurate Personal Data. Unless otherwise set forth in this Privacy Statement, Copaco shall only use Personal Data in ways that are compatible with the purposes for which it was collected, or subsequently authorized by you. To the extent necessary for these purposes, Copaco shall take reasonable steps to ensure that Personal Data is accurate, complete, current and relevant to its intended use.

International Data Transfers. Our primary Website servers are located in the Netherlands, and our Affiliates, third party service providers and partners operate in the Benelux. This means that when we collect your Personal Data we process it in one of these countries, and European privacy legislation is applicable.

Retention Period. We retain Personal Data we collect from you in case we have an ongoing legitimate business need to do so, according to the applicable legal terms (for example, to provide you with an offering you have requested for or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymize it or, if not possible (for example, because your Personal Data has been stored in backup archives), we will securely store your Personal Data and isolate it from any further processing until removal is possible.

Your Data Protection Rights. You have the following data protection rights:

- if you wish to access, correct, update or request removal of your Personal Data, you



- can do so at any time by contacting us using the contact details below;
- in addition you can object to processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data. Again, you can exercise these rights by contacting us using the contact details below;
  - you have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking the "unsubscribe" button or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details below;
  - similarly, when we collect and process your Personal Data with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data conducted in reliance on lawful processing grounds other than consent;
  - you have the right to file a complaint to a data protection authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Your privacy contact. Your Personal Data are processed by the Copaco subsidiary you are doing business with. If you have questions about the Personal Data that you have submitted, please contact the relevant subsidiary.

Sensitive Information. Unless we specifically request for it, we ask you to not send us, any sensitive personal data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or via this Website. In case we request you to provide sensitive personal data, we will do so with your explicit consent.

Third Party Websites. In addition to providing access to offerings, the Website may include links to other websites and web services. This Privacy Statement does not apply to those websites and services and the privacy practices of those websites and services may differ from those described in this Privacy Statement. Copaco encourages you to carefully read the privacy policy of any website or web service you visit.

Compliance. Copaco will use a self-assessment approach to verify compliance to this Privacy Statement and periodically verify if the Privacy Statement is accurate and comprehensive for the information intended to be covered, prominently displayed, implemented and accessible.

If you believe that your Personal Data has been processed or disclosed in violation of this Privacy Statement, Copaco encourages you to report any concerns using the contact information provided in this Privacy Statement using the contact details below. Copaco will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Data.

Revisions. Copaco may from time to time revise this Privacy Statement in its sole and absolute discretion to reflect changes in our business practices. When we revise this Privacy Statement, we will notify you by posting the updated Privacy Statement on this Website or by sending you



a notification by e-mail. Changes to the Privacy Statement will become effective and will apply to the information collected starting on the date Copaco posts the revised Privacy Statement on the Website. If we are required to obtain your consent to any changes in use of your Personal Data described in our updated Privacy Statement by applicable data protection laws, then we will do so.

## **7. Contact**

If you have any questions or concerns about this Privacy Statement, the privacy practices of Copaco, our collection or use of your Personal Data, or you wish to access your Personal Data, please contact us at: [compliance@copaco.com](mailto:compliance@copaco.com).

Our Data Protection Officer can be contacted at [jan.van.den.brand@copaco.com](mailto:jan.van.den.brand@copaco.com).