

PRIVACY STATEMENT

Last date of revision: 02/06/2021

1. WHO DOES THIS PRIVACY STATEMENT APPLY TO?

1. This Privacy Statement applies to Behey BV (with registered offices at: 8500 Kortrijk, Bloemistenstraat 6; company number: 0405.315.587).

Behey Jewels (“**We**”) is a supplier of golden and silver jewelry in Belgium and Luxembourg, and also an important player on the French market.

2. Behey is a separate and independent legal entity that processes personal data. We act as data controller for the processing of your personal data.
3. We are committed to protect and process the personal data entrusted to us in a correct and transparent manner, in accordance with the applicable law and in particular with respect of the General Data Protection Regulation 2016/679 of 27 April 2016 (better known under “AVG” or “GDPR”).

Please follow the links below for further information.

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2. WHAT IS COVERED BY THIS PRIVACY STATEMENT?

- 2.1. With this Privacy Statement we would like to inform you about why and how we process your personal data as data controller when we perform our business activities, or when you use our Sites and any of the formats and applications we offer through the Sites, who we give that information to, what your rights are and who you can contact for more information.

Information on the cookies used by us and similar technologies can be found in a separate Cookie policy.

- 2.2. When we refer to “the Sites”, we mean one of the webpages that start with the following url:

- www.behey-jewels.be
- www.one-more.org

- www.naiomy.com
- www.duo-trouwringen.com
- www.oudgoud.be

- 2.3. The Sites may contain links to other websites. Whilst we try to link only to sites that share our high standards regarding data protection, we are not responsible for the content or the policy regarding data protection of those websites. This Privacy Statement only relates to data collected by us.

When you click the links on the Sites, we strongly recommend you to review the Privacy Statements on these sites, before disclosing any personal data.

- 2.4 This Privacy Statement also covers the online presence on social media. We are present at social networks and platforms to be able to communicate with customers, users and other interested parties and to inform them about our services. We process data of visitors on our social media when they communicate with us, e.g. by reacting to our posts or by directly sending us messages.

Please be aware that, when you visit our page on Facebook and Instagram, whether or not using the shortcut on our website, cookies are used by Facebook or Instagram. In this way, we can obtain more information - in a complete anonymized way - about the public that visits our Facebook and Instagram pages.

For more information about why and how personal data are processed in this respect, we refer to the Privacy and Cookie policy on the websites of Facebook and LinkedIn:

- Cookie policy Facebook: <https://www.facebook.com/policies/cookies/>
- Privacy policy Facebook: <https://www.facebook.com/about/privacy/>
- Cookie policy Instagram: <https://help.instagram.com/1896641480634370>
- Privacy policy Instagram: <https://help.instagram.com/402411646841720>

3. FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA?

3.1. I AM A WEBSITE VISITOR OR VISITOR OF SOCIAL MEDIA

- 3.1.1. We process your personal data for legitimate business reasons. The purposes include, but are not limited to:

- handling enquiries, requests and complaints sent to the general contact addresses or via online forms;
- ensuring the functionality of the Sites;
- offering our (online) services and applications;
- ensuring the safety of our information technology systems;
- collecting statistics about the use of the Sites;
- improving the performance and appearance of the Sites.

3.2. I AM (A CONTACT PERSON OF) A CUSTOMER, A SUPPLIER OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT OR A CONSUMER)

3.2.1. We process your personal data for legitimate business reasons. These purposes include, but are not limited to:

- customer and supplier management;
- consumer management;
- business contacts management;
- orders and supply management;
- invoicing and accounting;
- the provision of information on our company, products, services and special offers;
- the good organisation of our services;
- direct marketing and sales;
- marketing purposes;
- dealing with enquiries, requests and complaints;
- dispute management;
- statistics and market research;
- safety;
- respecting our legal obligations.

3.3. I AM A JOB APPLICANT

3.3.1 The purpose for processing your personal data is to register your application for a job in our company and, if this application leads to start our selection procedure, make a profile of you, meaning that we will process all the necessary data that is required for us to assess your job application in view of a potential recruitment. This evaluation can also imply an evaluation by a third party ('assessment').

3.3.2 In case of positive evaluation and decision to hire, we will also use your personal data to prepare an employment contract.

3.3.3 In case of a decision not to hire you, we will also retain your personal data for a specified period as well, i.e. in order to be able to contact you in the future if any future job opportunities would seem to match your profile and with a view to the management of possible disputes.

4. ON WHAT LEGAL GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

4.1. I AM A WEBSITE VISITOR OR VISITOR ON SOCIAL MEDIA

4.1.1. When you contact us through a general contact address or the online contact form, your personal data will in principle be processed for the purposes of our legitimate interests (namely the interest to handle your enquiries, requests and complaints in the best possible way).

We also process data in our legitimate interest to ensure the functionality of the website and to guarantee the safety of our information technology systems.

In this respect, we will always determine case by case whether our interests are not overridden by your interests, fundamental rights and freedoms. If you would like more information about this, you can always contact us.

4.1.2. For sending electronic direct marketing we will always ask your explicit consent, unless we have obtained your e-mail address in the context of the sale of related products or services

and you have not opposed to such use of your data. You may unsubscribe at any time by clicking 'Unsubscribe' at the bottom of the direct marketing message.

4.1.3 For more information about the use of cookies, we refer to our Cookie policy.

4.2. I AM (A CONTACT PERSON OF) A CUSTOMER, A SUPPLIER OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT OR A CONSUMER)

4.2.1 We process your personal data on the following legal grounds:

- for the purpose of concluding and performing contracts concluded with you, including (but not limited to) accounting, invoicing and deliveries;
- for complying with legal obligations;
- for the purpose of the legitimate interest of our company and/or a third party, including (but not limited to) the smooth running of our business activities, customer and supplier management etc. and after conducting a balancing test with your interests. If you would like more information about this, you can always contact us.

4.2.2 If we have the legal obligation to obtain your free, informed, specific and unambiguous consent to process your personal data for certain purposes (e.g. very specific direct marketing and market research activities), we will only process your data for such purposes to the extent that we have obtained such consent from you.

For example, we will always ask your explicit consent for sending direct marketing, unless we have obtained your e-mail address in the context of the sale of related products or services and you have not opposed to such use of your data. You may unsubscribe at any time by clicking the unsubscribe button in the direct marketing message.

4.3. I AM A JOB APPLICANT

4.3.1 The processing of your personal data is necessary to take measures prior to the conclusion of an employment agreement.

During the recruitment process, we may also process data for our legitimate interest, such as in the case an online presence screening carried out to protect us against fraud and image damage, or in the case of transfer of data to assessment centers or screening agencies (to allow such service providers to assess or screen you).

We will ensure that your interests or fundamental rights and freedoms are not overridden and will constantly monitor this.

4.3.2 Keeping your data during a certain period of time in order to contact you in case of future opportunities or to be able to defend ourselves with regard to the recruitment process is also within our legitimate interest.

5. WHAT ARE YOUR RIGHTS?

5.1. You have several rights concerning the personal data we process about you. In particular, you have the right to:

- gain access to your personal data and receive a copy thereof;
- ask that we update your personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- ask that we delete your personal data or restrict the way in which we use such data if you believe that there is no (longer a) lawful ground for us to process it;
- withdraw your consent to the processing of your personal data (to the extent the processing is based on your consent);
- receive a copy of your personal data in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or the execution of a contract);
- object to the processing of personal data for which we use legitimate interest as a legal ground, in which case we will cease the processing unless we have compelling legitimate grounds for the processing.

5.2. You also have the right to object at any time to the processing of personal data for direct marketing by contacting us (see below) or by clicking the unsubscribe link in the direct marketing messages we sent. In that case, we will no longer process your personal data for direct marketing purposes.

5.3. In order to exercise any of your rights, you can:

- send an e-mail to: **info@behey-t-jewels.be**
- call us: **+32 (0)56 25 80 78**
- send a written query to: Behey-t, for the attention of **privacy department, Bloemistenstraat 6 , 8500 Kortrijk**

You may also use these contact details if you wish to make a complaint relating to the processing of personal data.

5.4. If you are unhappy with the way we have handled your personal data, you have the right to lodge a complaint with a supervisory authority in the member state of your habitual residence.

6. HOW DO WE OBTAIN PERSONAL DATA?

6.1. I AM A WEBSITE VISITOR OR VISITOR ON SOCIAL MEDIA

6.1.1. We may obtain your personal data when you use the Sites and the applications offered thereon (e.g. contact form). We may also obtain your data when you contact us via the contact details mentioned on our Sites or when you react on our social media. For information on how we collect data for cookies and similar technologies, please see our Cookie policy.

6.1. I AM (A CONTACT PERSON OF) A CUSTOMER, A SUPPLIER OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT OR A CONSUMER)

6.1.1. We may obtain your personal data in the framework of the execution of our business activities.

6.1.2. We may obtain such personal data because you give them to us (for example by contacting us etc.), because others give them to us (for example third party service providers that we

use in the framework of our activities or your employer) or because they are publicly available.

We may also obtain your personal data through the way you interact with us.

- 6.1.3. When we obtain personal data from external parties, we make reasonable efforts to enter into contractual clauses with these parties obliging them to respect the relevant rules regarding data protection. This can be done by obliging this party to provide you with all necessary information or - if necessary - to obtain your consent for processing the personal data as described in this Privacy Statement.

6.2. I AM A JOB APPLICANT

- 6.3.1 We will first obtain personal data from you because you provide them to us in the context of your application.
- 6.3.2 During the application process we can also generate or obtain personal data relating to you from others (e.g. references).

7. WHICH PERSONAL DATA DO WE COLLECT?

7.1. I AM A WEBSITE VISITOR OR VISITOR ON SOCIAL MEDIA

- 7.1.1. We may collect all personal data about you that you yourself provide to us when you contact us via the contact details mentioned on the Sites or via the contact form on the Sites.

Via the contact form on our Sites we collect the following data:

- name
- e-mail address
- telephone/mobile phone-number
- your message, enquiry or remark
- your marriage date (on the website www.duo-trouwringen.com)
- your date of birth (on the website www.one-more.org)
- your address (on the website www.one-more.org and www.duo-trouwringen.com)
- your language (on the website www.one-more.org)
- your purchase details for warranty (on the website www.one-more.org)

- 7.1.2. We may also collect all personal data about you that you yourself provide to us when you contact us via social media, including your account name.

7.2. I AM (A CONTACT PERSON OF) A CUSTOMER, A SUPPLIER OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT OR A CONSUMER)

- 7.2.1. The personal data that we collect may include the following:
- standard identification and contact data (e.g. name, address (private / work), telephone number (private/work), e-mail address (private/work));
 - personal characteristics (e.g. age, gender, date of birth, place of birth, nationality, language ...);
 - financial data (e.g. bank account number, ...);
 - employment data (e.g. organisation you work for, job title ...);

- the information you provide us in forms (e.g. contact forms) and to all possible services and communication channels that we offer;
- data about how you use our products and services;
- camera images;
- data about how you interact with us and other similar information.

7.3. I AM A JOB APPLICANT

7.3.1 The personal data that we collect may include the following:

- standard data related to your identity (surname, name(s), address, ...);
- personal data (date and place of birth, nationality, gender, phone number, e-mail address, ...);
- your picture if you give it to us on a voluntary basis (e.g. included in your CV);
- data with regard to your professional experience (profile, data on previous employers, termination of last employments and work carried out, special projects, ...), including reference checks if you have given your consent;
- data with regard to your education (diploma's, certificates, internships, special trainings, ...);
- language skills;
- if applicable, whether you possess a permit of working and/or reside in the European Economic Area (EEA);
- any other personal data that you present us with as part of your application, in your CV or motivation letter, related to the exercise of the role;
- digital assessment through the internet (social media presence), insofar as this presence is open for us to see;
- any other personal data (than mentioned above) that require processing by virtue of the law.

7.3.2 You are not required to provide us with these data. However, not doing so might adversely affect your chances of recruitment

8. TO WHOM CAN WE DISCLOSE YOUR PERSONAL DATA?

8.1. I AM A WEBSITE VISITOR OR VISITOR ON SOCIAL MEDIA

OR

I AM (A CONTACT PERSON OF) A CUSTOMER, A SUPPLIER OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT OR A CONSUMER)

1. We may disclose your personal data to other related companies or third parties that reasonably require access to these data for one or more of the purposes referred to above. The following external parties may for instance be involved:
 - external service providers we rely on for various business services;
 - law enforcement authorities and public authorities in accordance with the applicable legislation;
 - external professional advisors (e.g. attorneys or consultants).

8.1.2 We do not transfer your personal data to recipients located outside the European Economic Area (EEA) whose laws do not provide the same level of data protection.

8.2. I AM A JOB APPLICANT

8.2.1 HR and your envisaged hierarchic superior(s) will have access to your personal data on a strict 'need-to-know' basis for the purposes described above.

We will not forward your details to other parties, with the possible exception of assessment centres, etc. or any other third party if this is relevant to the recruitment procedure.

The confidentiality of your personal data is guaranteed.

8.2.2 We do not transfer your personal data to recipients located in countries outside the European Economic Area (EEA) whose laws do not provide the same level of data protection

9. ARE YOUR PERSONAL DATA PROTECTED?

9.1. We employ strict technical and organizational (security) measures to protect your personal data from access by unauthorised persons, against unlawful processing, abuse, damage, loss and destruction both online and offline.

9.2. These measures include:

- trainings and instructions (a.o. via policies) to relevant staff to ensure they are aware of our obligations regarding data protection when handling personal data;
- administrative and technical controls to restrict access to personal data to the necessary extent;
- technological security measures, including passwords, fire walls, anti-virus software and encryption;
- physical security measures, such as staff security badges to control the access to our premises.

9.3. Although we take appropriate security measures once we receive your personal data, in particular the transfer of data via the internet (including e-mail) is never completely secure. We do our utmost best to protect your personal data, but we can never fully guarantee the safety of the personal data sent to us or send by us.

We restrict access to your personal data to the persons who reasonably need this information to perform their tasks.

10. HOW LONG WILL YOUR PERSONAL DATA BE STORED?

10.1. I AM A WEBSITE VISITOR OR VISITOR ON SOCIAL MEDIA

10.1.1. Your personal data will not be stored longer than necessary for the purposes described above.

10.1.2. As a general rule, personal data obtained through our Sites are stored for a period of 5 years.

Personal data processed in the context of direct marketing, for example for our newsletters, will in principle be stored for a period of 5 years from the last contact with our company. However, we can store your personal data longer for these purposes if you have become a customer of ours, namely for a period of 10 years from the delivery of products or services, or from the last contact with our company if that would take place later.

10.1.3. Depending on the specific situation, we may however retain your personal data for a longer period. This will in particular be the case if any of the following periods is longer: (i) as long as is necessary for the activity or service concerned; (ii) any retention period that is required by law; or (iii) the end of the period in which judicial proceedings might arise.

10.2. I AM (A CONTACT PERSON OF) A CUSTOMER, A SUPPLIER OR ANY OTHER INDIVIDUAL WHOSE PERSONAL DATA ARE PROCESSED (E.G. A VISITOR, A BUSINESS CONTACT OR A CONSUMER)

10.2.1. As a general rule, personal data in the framework of the use of our services are stored for a period of 10 years as from the end of the contractual relationship (including warranty periods and after-sales services).

10.2.2. Personal data processed in the context of direct marketing, for example for our newsletters, will in principle be stored for a period of 5 years from the last contact with our company. However, we can store your personal data longer for these purposes if you have become a customer of ours, namely for a period of 10 years from the delivery of products or services, or from the last contact with our company if that would take place later.

10.2.3. Camera images are kept for 30 days unless a violation can be detected. In the latter case, we will keep the images for as long as necessary in the context of a possible claim or procedure.

10.2.4. Depending on the specific situation, we may however retain your personal data for a longer period. This will in particular be the case if any of the following periods is longer: (i) as long as is necessary for the activity or service concerned; (ii) any retention period that is required by law; or (iii) the end of the period in which judicial proceedings might arise.

10.3. I AM A JOB APPLICANT

10.3.1 We will retain your personal data for the period necessary in the light of the above purposes.

If the application does not result in an employment relationship, your personal data will be stored for 5 years after the end of the recruitment procedure for the purpose discussed under 3.3.3 of this Privacy Statement.

11. ARE YOUR PERSONAL DATA USED FOR AUTOMATED DECISION-MAKING?

11.1. Automated decisions are defined as decisions about individuals that are solely based on the automated processing of data and that produce legal effects that significantly affect the individuals involved.

As a rule, your personal data will not be used for automated decision-making. We do not base any decisions about you solely on automated processing of your personal data (also not in the context of our recruitment process).

12. HOW TO CONTACT US?

- 12.1. If you have any further queries about this Privacy Statement and the Sites in general, you can contact us:
- by e-mailing us at **info@behey-jewels.be**
 - by addressing your written query to: **Behey, for the attention of Privacy department, Bloemistenstraat 6, 8500 Kortrijk**

13. CHANGES TO THIS PRIVACY STATEMENT

- 13.1. We may modify this Privacy Statement from time to time. To let you know when we made changes to this Privacy Statement, we will amend the revision date at the top of this page. The modified Privacy Statement will apply from that date.

Please check this page periodically to see changes and additions.