

This "Privacy Policy" regulates the processing of your personal data by the controller: Pomton BV, with registered office in 2000 Antwerp, kattendijkdok-Oostkaai 60 and registered in the K.B.O. under number BE0722.951.292 (hereinafter: "Pomton BV").

Please read this Privacy Policy carefully as it contains essential information about how we process your Personal Data and which cookies we use.

## **Article 1 - General**

This Privacy Policy applies to any processing of Personal Data by Pomton BV, including through the website pomtin.com (hereinafter: "the Website"), as well as through any contact with Pomton BV and by providing your personal data to Pomton BV, you declare that you have read this Privacy Policy and expressly agree to it, as well as to the processing itself.

Pomton BV, through this Privacy Policy, is in line with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data.

The controller of the processing of your personal data is Pomton BV.

## **Article 2 - Personal Data**

The Personal Data that you communicate to us are the following :

When placing an order: Name, first name, contact information (delivery and possibly billing address, email address, phone number), possibly address;

If you also create a profile: your password;

When subscribing to the newsletter: name and e-mail address;

If you contact us with a question or complaint via the contact form: surname, first name, e-mail, telephone number and the personal data that you additionally communicate in your message;

If you contact us by e-mail or telephone: the personal data that you yourself communicate;

When surfing the website: cookies (cfr. article 8).

### **Article 3 - Purposes of the processing**

3.1. Pomton BV will only use the Personal Data collected from you for the following purposes:

The maintenance and improvement of this Website and the inclusion of Personal Data in anonymous statistics, from which the identity of specific individuals or companies cannot be traced, with the legal basis being the legitimate interests of Pomton BV to continuously improve its Website and services;

The management of your account on this Website for the purpose of using the services of Pomton BV and the Website, with the legal basis being the performance of a contract requested by you;

sending you direct marketing, newsletters, actions and promotions, with the legal basis being your explicit, prior consent;

The delivery and invoicing of products ordered by you, with the legal basis being the provision of a service requested by you.

Responding to your complaints and inquiries with the legal basis being our legitimate interest.

You are not obliged to disclose your Personal Data, but understand that the provision of certain services is impossible if you refuse the processing.

### 3.2. Direct Marketing:

We will also use your Personal Data for direct marketing, provided that you have provided additional express consent ("opt-in").

In this case, Pomton BV may use your Personal Data to receive marketing materials in paper and/or electronic form and to send marketing and other materials relating to Pomton BV, its products and/or services. This consent may be withdrawn at any time, without justification and free of charge by clicking, for example, on the unsubscribe link provided for this purpose, at the bottom of each promotional e-mail message.

### 3.3. Transfer to third parties:

In the event of full or partial reorganization or transfer of activities of Pomton BV, whereby it reorganizes, transfers, discontinues its business activities, or if Pomton BV goes bankrupt, this may involve the transfer of your Personal Data to new entities or third parties through which all or part of Pomton BV's business activities are conducted.

Pomton BV will make reasonable efforts to notify you in advance of any disclosure of your Personal Data by Pomton BV to such third parties, but you also acknowledge that this may not be technically or commercially feasible in all circumstances. Pomton BV will not sell, rent, distribute or otherwise make your Personal Data commercially available to third parties except as described above or except with your prior consent.

### 3.4. Legal Requirements:

On rare occasions, Pomton BV may be required to disclose your Personal Data pursuant to a court order or to comply with other mandatory laws or regulations. Pomton BV will make reasonable efforts to inform you in advance in this regard, unless subject to legal restrictions.

## **Article 4 - Duration of Processing**

We will retain and process the Personal Data for a period necessary in function of the purposes of the processing and in function of the contractual relationship between you and Pomton BV.

## **Article 5 - Your Rights**

5.1. Right of access and inspection: You have the right to learn about your Personal Data at any time, free of charge, as well as about the use we make of your Personal Data.

5.2. Right of rectification, deletion and restriction: You are free to communicate or not communicate your Personal Data to Pomton BV. In addition, you always have the right to request us to correct, supplement or delete your Personal Data. You acknowledge that if you refuse to communicate or request the deletion of Personal Data, certain services and products will not be available. You may also request to restrict the processing of your Personal Data.

5.3. Right of Objection:

You also have a right to oppose the processing of your Personal Data for serious and legitimate reasons. In addition, you always have the right to oppose the use of Personal Data for direct marketing purposes; in such case, you do not have to provide reasons.

5.4. Right of free data transfer:

You have the right to obtain and/or transfer to other controllers your Personal Data processed by us in structured, common and machine-readable form.

5.5. Right of withdrawal of consent:

To the extent processing is based on your prior consent, you have the right to withdraw that consent.

#### 5.6. Exercise of your rights:

You may exercise your rights by contacting us to do so, either by e-mail to [nathan@pomton.com](mailto:nathan@pomton.com) by post to Pomton BV, with registered office at 2000 Antwerp, Kattendijkdok-Oostkaai 60 Automatic decisions and profiling:

The processing of your Personal Data does not include profiling, nor will you be subject to automated decisions by us.

#### 5.8. Right to complain:

You have the right to file a complaint with the Belgian Data Protection Authority (GBA), Printing Press Street 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: : [contact@apd-gba.be](mailto:contact@apd-gba.be)

This is without prejudice to a remedy before a civil court.

### **Article 6 - Security and confidentiality**

6.1. We have developed security measures adapted at the technical and organizational levels to avoid the destruction, loss, falsification, modification, unauthorized access or inadvertent notification to third parties of personal data collected as well as any other unauthorized processing of these data.

6.2. Under no circumstances can Pomton BV be held liable for any direct or indirect damages resulting from an erroneous or unlawful use by a third party of the Personal Data.

6.3. You must at all times comply with the security regulations, including preventing any unauthorized access to the login and code your computer. You are therefore solely responsible for the use made from the Website of your computer, IP address and identification data, as well as their confidentiality.

## **Article 7 - Third party access**

In order to process your Personal Data, we grant access to your Personal Data to our employees.

We guarantee a similar level of protection by making contractual obligations opposable to these employees and appointees, which are similar to this Privacy Policy.

## **Article 8 - Cookies**

### 8.1. What are cookies?

A "cookie" is a small file sent by the server of Pomton BV and placed on the hard drive of your computer. The information stored on these cookies can only be read by us and only for the duration of the visit to the Website.

### 8.2. Why do we use cookies?

Our Website uses cookies and similar technologies to distinguish your usage preferences from those of other users of our Website. This helps us to provide you with a better user experience when you visit our Website and also allows us to optimize our Website.

As a result of recent legislative changes, all Websites targeting certain parts of the European Union are required to ask your permission to use or store cookies and similar technologies on your computers or mobile devices. This cookie policy gives you clear and comprehensive information about the cookies we use and their purpose.

### 8.3. Types of Cookies:

Although there are different types of cookies, distinguished by functionality, origin or retention period, the legislation mainly distinguishes between functional or technically necessary cookies on the one hand and all other cookies on the other hand.

The Website only uses the following cookies:

***Non-functional cookies***

<b>Naam</b>	<b>Origin</b>	<b>Function</b>	<b>Retention time</b>
Google Analytics	Google	Statistics and activity tracking	Maximum 30 days
Google Ads	Google	Remarketing Tag	Maximum 30 days
Facebook Pixel	Facebook	Browsing behavior	Maximum 30 days

For cookies placed by third parties (including Google Analytics), we would like to refer you to the statements made by these parties on their respective websites about them. Please note that we do not exercise any influence on the content of those statements, nor on the content of the cookies of these third parties:

Google Analytics cookies

8.4. Your consent:

Upon your first visit to our Website, you will be asked to accept our cookies.

You can refuse the installation of these cookies by choosing "Decline cookies" in the pop-up screen provided for this purpose during your first use of the Website.

You can also refuse or block cookies by changing the configuration parameters of your navigation system. Disabling cookies may prevent you from using certain functionalities of the Website.

Should you have further questions or comments regarding the processing of your Personal Data, please feel free to contact us either by e-mail to [nathan@pomton.com](mailto:nathan@pomton.com) or by mail to Pomton BV, 2000 Antwerp, Kattendijkdok-Oostkaai 60, or by using the "Contact Us" section on the Website.

You can also find more information about cookies at:  
<http://www.allaboutcookies.org/>.

More information about online behavioral advertising and online privacy can be found here: <http://www.youronlinechoices.eu/>