

# Privacy Policy

This privacy policy (hereinafter: “**Privacy Policy**”) governs the processing of your personal data by Beaulieu Canada and its affiliates as part of your visit to our websites (hereinafter: “**Websites**”), your communication with us via email, phone, fax and social media (hereinafter: “**Social Media Channels**”; e.g. Facebook, LinkedIn, Pinterest, Instagram, etc.) and in relation to any order or purchase.

*\* This Privacy Policy does not apply to the processing of personal data of people who choose to apply via our career section of our website.*

*\*\* If you want information on how we process personal data via cookies, social plug-ins, pixels and other types of tracking technology, please refer to our Cookies Policy.*

## 1. General

**1.1 Your personal data is processed by Beaulieu Canada and its affiliates (hereinafter: “we”, “us”, “our”).** This is the entity responsible for the processing of your personal data as covered in this Privacy Policy.

**1.2 Any notion starting with a capital shall be defined by explicit reference in this Privacy Policy. Where possible given the context, singular words shall be interpreted as also including the plus and vice-versa.** To make sure we have the same understanding of what is written here, it is important that certain notions are interpreted in the same way by you and by us.

**1.3 Where reference is made to certain laws or regulations, such reference shall also include any change, replacement or annulment of said laws or regulations, including any related executive decisions.** Laws tend to change from time to time, and we want to make sure that this Privacy Policy remains in line with any such changes.

**1.4 Beaulieu Canada reserves the right to modify, change or amend this Privacy Policy at its own discretion and from time to time. Such modification, change or amendment shall be communicated via the Websites. If you do not accept the modifications, changes or amendments, you are to inform us via our website’s contact-us section. If we do not receive such an email from you within three (3) business days after the changes to the Privacy Policy have been announced on our Websites, you will be deemed to have unambiguously accepted all such changes.** As any company, changes in laws, market circumstances, interests, etc. may require us to change our Privacy Policy from time to time to ensure that it remains accurate. If this happens, you are kindly asked to take note of the changes and to agree with them if you find them acceptable.

## 2. Types of personal data we process

**2.1 Whenever you use our Websites and Social Media Channels, we collect:**

- **technical information** associated with the device you use, such as your IP address, browser type, geographical location and operating system;
- information concerning your **browsing behavior**, such as how long you visit, what links you click on, what pages you visit and how many times you visit a page.

Here we explain which types of personal data we collect in any case whenever you visit our Websites and Social Media Channels.

## **2.2 When you fill out a contact form on our Websites, or contact us via email or Social Media Channels, we collect:**

- the **basic identity information** you provide us with, such as name, and email address;
- the **content of your communication** and the **technical details of the communication** itself (with whom you correspond at our end, date and time, etc);
- your **preferences** in regards to **the communication medium used**;
- **your preferences regarding receiving our email communications**, such as newsletters, promotions, advertisements, etc., if you have chosen to receive such communications;
- **publicly available information of your profile** on Social Media Channels;
- **any other personal data** you choose to provide to us.

Here we explain which types of personal data we collect when you actively seek to contact us or want us to contact you.

## **2.3 When you place an order or purchase something with Beaulieu Canada, we additionally collect:**

- **financial data** such as banking information, invoices or other data that we need to process your order or purchase.
- **Any other personal data** you choose to provide to us.

Here we explain which types of data we gather in order to process an order or purchase.

**2.4 All of the personal data listed above, we receive directly from you. It may happen that we receive additional information about your preferences and surfing behavior from partners such as Google, Facebook, etc. If you require more information about the personal data these parties process about you and make available to others, you are kindly requested to consult their respective privacy policies.** We would like to make it clear that most of the personal data we process, we receive directly from you. However, from time to time we may receive personal data from third parties, who we have listed in this clause. We have no control over what these parties do with your personal data, which is why we refer you to their privacy policies.

- **Google:** <https://policies.google.com/privacy?hl=en>

- Facebook: <https://www.facebook.com/about/privacy>

### 3. Purposes for processing

**3.1 Beaulieu Canada processes your personal data to provide you in a personalized and efficient way with the information, products and services you request via the Websites, email, telephone, fax or Social Media Channels.** We first and foremost collect and process your personal data to provide you with the things you request by contacting us or by surfing to our Websites and Social Media Channels.

**3.2 Beaulieu Canada processes your personal data for marketing purposes, i.e. to provide you with targeted communications, promotions, offerings and other advertisements of Beaulieu Canada and select partners. Unless you are an existing customer who has already purchased similar goods or services from us and who we wish to target with our own marketing material, Beaulieu Canada will only send you communications, promotions, offerings, newsletters and other advertisements via email or other person-to-person electronic communications channels if you have explicitly consented to receiving such communications, promotions, offerings, newsletters and other advertisements.** We want to use your personal data for marketing purposes. This means that we collect information regarding your preferences and interests and use this information to make our marketing material more relevant to you. When we want to send you marketing material via email, LinkedIn InMail, Facebook Messenger or other person-to-person electronic communications channels, we will in principle first seek your priori approval with receiving our marketing via such channels. You can always change your preferences regarding receiving our marketing material by following the opt-out link provided in such communications.

**3.3 Beaulieu Canada processes your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities. Your personal data may be transferred upon Beaulieu Canada's own initiative to the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you through your registration with or use of the Websites, our Social Media Channels or other communication with us.** From time to time we may be legally required to transfer your personal data to governmental authorities.

**3.4 Beaulieu Canada may be required to collect and transfer your personal data to the financial institution or payment service provider to allow your financial institution and the payment service provider to comply with their legal obligations, such as obligations under applicable anti-money laundering and counter-terrorism financing legislation.** When we offer online payment possibilities, our payment service provider or financial institution may require personal data to do legally obligatory checks. Hence, we must collect and transfer such data to the payment service provider or financial institution.

**3.5 Beaulieu Canada processes your personal data to perform statistical analyses so that we may improve our Websites, products and services or develop new products and services.**

**3.6 Beaulieu Canada may process your personal data for informing any third party in the context of a possible merger with, acquisition from/by or demerger by that third party, even if that third party is located outside North America.**

**3.7 Beaulieu Canada may process your personal data for the preservation of the legitimate interests of Beaulieu Canada, its partners or a third party if and when your registration with or use of the Websites, Social Media Channels or other communication channels can be considered (a) a violation of any applicable term of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Websites, Social Media Channels or other communication channels, (c) a danger to the Websites, Social Media Channels or other communication channels or any of Beaulieu Canada or its subcontractors' underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful , obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.** Here we reserve the right to process your personal data if you use our Websites, Social Media Channels or other communication channels in any way that may harm Beaulieu Canada or someone else or is illegal.

## **4. Legal basis for processing your personal data**

**4.1 For processing your personal data under the conditions outlined in this Privacy Policy, Beaulieu Canada as the responsible party asks for your consent.** The law required us to state precisely which legal basis we use to process your personal data, considering the purposes we have listed in the previous article. Beaulieu Canada asks first and foremost your consent with its processing of your personal data when you fill out a contact form on the Websites. When you contact us directly via telephone, fax, email or Social Media Channels, you also implicitly consent to our processing of your personal data.

**4.2 The processing of your personal data when you place an order or make a purchase through Beaulieu Canada is necessary to conclude and execute the sales agreement with you.** Beaulieu Canada processes your details during and after so that we can link the order to you, execute the payment and successfully complete the delivery and possible return of your order. Failure to provide the necessary information will result in the agreement not to be concluded.

**4.3 The processing of your personal data for the purposes outlined previously is necessary to allow Beaulieu Canada to comply with its legal obligations.** Sometimes the law obliges us to process your personal data.

**4.4 The processing of your personal data for the purposes which are set out in clauses 3.2, 3.5, 3.6 et 3.7 is necessary for the purposes of the legitimate interests of Beaulieu Canada which are:**

- **continuous improvements to Beaulieu Canada's Websites, Social Media Channels, products and services to ensure that you have the best experience possible;**
- **keeping our Websites, Social Media Channels, products and services safe from misuse and illegal activity;**

- **marketing and promotion of our products, services, brands an overall successful commercialization of our products and services.**

We may also process your personal data for our own legitimate interests, which are mainly concerned with successfully conducting our business as any other company would do so.

## **5. Recipients**

**5.1 Beaulieu Canada does not send your personal data in an identifiable manner to any third party without your explicit permission to do so. You understand, however, that if you use our Social Media Channels, your personal data is also processed by the social media providers.** We do not share your personal data with third parties unless you consent to it or unless we have anonymized your personal data. You understand however that when you use Facebook for instance to communicate, Facebook also processes your personal data. Likewise, if you make or receive payments, your bank or payment service provider will process your personal data.

**5.2 Beaulieu Canada relies on third party processors to provide you the Websites as well as to process your personal data on our behalf. These third party processors are only allowed to process your personal data on behalf of Beaulieu Canada upon explicit written instruction of Beaulieu Canada. Beaulieu Canada warrants that all third party processors are selected with due care and are obligated to observe the safety and integrity of your personal data.** Our Websites may be developed, maintained or hosted by third parties. Similarly, we rely on the services of third parties such as cloud providers to process your personal data internally.

## **6. Location and transfer**

**6.1 Beaulieu Canada processes your personal data first and foremost within North-America. However, in order to process your personal data for the purposes outlined in article 3 above, we may also transfer your personal data to third parties who process on our behalf which are located outside North America. Each entity outside North America that processes your personal data shall be bound to observe adequate safeguards with regard to the processing of your personal data.**

**6.2 Beaulieu Canada may transfer anonymized and/or aggregated data to organizations outside of North America. Should such transfer take place, Beaulieu Canada will ensure that there are safeguards in place to ensure the safety and integrity of your data as well as all rights with respect to personal data you might enjoy under applicable mandatory law.** We may anonymize your data or combine it with data of others thereby making it impossible to identify you. Such anonymous or aggregated information may also be transferred to countries outside North America.

## **7. Quality assurances**

**7.1 Beaulieu Canada does its utmost best to process only those personal data which are necessary to achieve the purposes listed under article 3.** We will not process more personal data about you than we need for the purposes we have communicated to you.

**7.2 Your personal data are only processed for as long as needed to achieve the purposes listed under article 3 of this Cookie Policy or up until such time where you withdraw your consent for processing them. Note that withdrawal of consent may imply that you can no longer use the whole or part of the Websites. Beaulieu Canada will de- identify your personal data when they are no longer necessary for the purposes outlined in article 3, unless there is:**

- **an overriding interest of Beaulieu Canada, your financial institution, the payment service provider, or any other third party in keeping your personal data identifiable;**
- **a legal or regulatory obligation or a judicial or administrative order that prevents Beaulieu Canada from de- identifying them.**

Here we explain how long we will keep your personal data in a way that allows us to identify you.

**7.3 Beaulieu Canada will take the appropriate technical and organizational measures to keep your personal data safe from unauthorized access or theft as well as accidental loss, tampering or destruction. Access by personnel of Beaulieu Canada. or its third-party processors will only be on a need- to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations only which can never be guaranteed. We are committed to keeping your personal data safe.**