

PRIVACY POLICY OF DE JONG DUKE

PROTECTION OF YOUR PRIVACY

1. Your privacy is very important to De Jong DUKE. This document explains what data we collect and for what purposes, how we obtain the data, what your rights are and how you can exercise those rights.
2. **CONTACT INFORMATION FOR DE JONG DUKE B.V.**

Name : J.M. de Jong DUKE Automatenfabriek B.V.
Address : Marisstraat 2, 3364 AZ Sliedrecht, the Netherlands
Telephone number : + 31 (0)184 496 767
Website : app.connectme.coffee
Email address : info@dejongDUKE.nl

DEFINITIONS

3. This Privacy Policy uses the following definitions:

"General Data Protection Regulation" ("GDPR"): Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

"User": any User with a ConnectMe user account for ConnectMe.

"Personal Data": any information in ConnectMe relating to an identified or identifiable natural person.

"Personal Data Processing" (hereinafter: **"Processing"**): any action relating to how Personal Data is handled, including how Personal Data is collected, recorded, shared and destroyed as recorded in ConnectMe.

"Data Controller": the person or organisation that is responsible for processing Personal Data and determines the purpose of and the means for processing Personal Data. J.M. de Jong DUKE Automatenfabriek B.V., established in Sliedrecht, the Netherlands (hereinafter: **"De Jong DUKE"**) is responsible for processing Personal Data in ConnectMe as described in this Privacy Policy.

ABOUT DE JONG DUKE AND CONNECTME

4. De Jong DUKE develops, produces and sells professional coffee machines for office environments (hereinafter: **"Product"**). De Jong DUKE sells and delivers the Product to coffee and service suppliers (hereinafter: **"Buyer"**) that resell, rent out, lease out or otherwise supply the Product to commercial end users and/or provide service and maintenance of the Product.

5. De Jong DUKE makes it possible for the Buyer to monitor and manage the Product using a ConnectMe Server that can be accessed via a web portal and web APIs (application programming interfaces for web services). For example, the Buyer can remotely obtain automatically updated information about the Product's operational and technical performance.
6. The ConnectMe Server can be accessed via a web portal and via one or more web APIs. For this access to the ConnectMe Server, De Jong DUKE will create an account at the Buyer's request (hereinafter: main account). This main account includes a user ID and a password for identifying the Buyer.
7. The Buyer is entitled to use the main account assigned by the Supplier to create sub-accounts (with user IDs) and by doing so build up a separate digital organisation of internal departments and/or end users (for example by creating Users within ConnectMe and/or creating (Sub)-organizations).

DATA COLLECTION

8. De Jong DUKE collects Personal Data in order to provide services to Users and/or the Buyer via ConnectMe for purposes of monitoring and managing the Product and as otherwise set forth herein.
9. Except as dictated otherwise by statutory obligations, the Users' Personal Data will be used exclusively for the goals or purposes stated in this Privacy Policy.
10. The Personal Data of all Users related to the Buyer will be destroyed within three months after the ConnectMe-related contract with the Buyer has been terminated or the data subject has announced that he or she no longer wishes to be treated as a User, unless the Personal Data are necessary in order to fulfil a statutory retention obligation. Anyone who does not wish particular information to be processed should contact De Jong DUKE.

PERSONAL DATA PROCESSING

11. Personal Data may be requested when a data subject registers to use ConnectMe. This information will be used to identify and authenticate the User.
12. When an account is created in ConnectMe, De Jong DUKE will request and record the following information:

<u>Category</u>	<u>Details</u>
Registration Information	First name, Last name, Phone number, Job title, E-mail address, IP address, Language preference.
Account information	Username, Password (encrypted), Business phone number

HOW WE USE PERSONAL DATA

13. De Young DUKE uses Personal Data only for the legal grounds and purposes described below.

<u>Purposes for which your Personal Data are processed</u>	<u>Legal basis for processing</u>	<u>Categories of recipients of your Personal Data</u>
To provide personal access to ConnectMe and to enable the use of ConnectMe services.	Execution of the contract with the Buyer (art 6(1) under b AVG).	Group companies belonging to J.M. de Jong BEHEER Verenigde Werkplaatsen BV, (website) hosting providers, maintenance and management parties.
Monitoring and managing the Product.	Execution of the contract with the Buyer (art 6(1) under b AVG).	Group companies belonging to J.M. de Jong BEHEER Verenigde Werkplaatsen BV, (website) hosting providers, maintenance and management parties.
To send important notices, such as messages about ConnectMe's new releases and maintenance or ConnectMe-related issues.	Execution of the contract with the Buyer (art 6(1) under b AVG).	Group companies belonging to J.M. de Jong BEHEER Verenigde Werkplaatsen BV, (website) hosting providers, maintenance and management parties.
To send notifications from ConnectMe.	Consent of the Buyer (Art. 6(1)(a) AVG).	Group companies belonging to J.M. de Jong BEHEER Verenigde Werkplaatsen BV, (website) hosting providers, maintenance and management parties.
Product development.	Legitimate interest (Art. 6(1)(f) AVG).	Group companies belonging to J.M. de Jong BEHEER Verenigde Werkplaatsen BV, (website) hosting providers, maintenance and management parties.

In the case of Product development, we have a legitimate interest to use your data. The legitimate interest will vary depending on the purpose for which De Jong DUKE uses personal data, and De Jong DUKE sets out the interest above in more detail. When De Jong DUKE processes personal data on the basis of a legitimate interest, we have - as required by the General Data Protection Regulation - carried out a balancing exercise to document the interests, whereby De Jong DUKE considers the consequences of the processing for the data subject whose personal data are being processed and to determine whether the interests of these persons outweigh the interests of De Jong DUKE in the processing. More information about this consideration can be obtained via the contact details at the bottom of this Privacy Policy.

SOURCE OF PERSONAL DATA

14. The information that De Jong DUKE processes is obtained from Users, who provide the information themselves. The ConnectMe server recognises the IP address. This technical processing is necessary to enable communication.

ONWARD SHARING WITH THIRD PARTIES

15. De Jong DUKE may share Users' Personal Data with other group companies that are a part of the J.M. de Jong BEHEER Verenigde Werkplaatsen B.V. and other service providers to be able to provide the ConnectMe services.
16. De Jong DUKE may share User's Personal Data with third party service providers, who will process it on behalf of De Jong DUKE for the purposes as mentioned in this Privacy Policy. Such third parties include (website) hosting providers, maintenance and management parties such as Trans IP, MongoDB Atlan and Mailgun.
17. De Jong DUKE will not pass on the Users' Personal Data to any other third parties, except where De Jong DUKE is obliged to pass on Personal Data to competent authorities based on a statutory obligation or judicial order.
18. De Jong DUKE will only share log files/audit files with other third parties if the Buyer's legal representative requests De Jong DUKE to do so or if De Jong DUKE is required to do so based on a statutory provision or judicial order.

ALTERATION/DESTRUCTION OF PERSONAL DATA

19. Users are entitled to access, rectify, supplement, delete, restrict and carry over (data portability) their Personal Data, as well as the right to object to the processing in accordance with the applicable privacy laws.
20. A User who wishes to exercise any of these rights or who has any questions about this Privacy Policy of De Jong DUKE may contact De Jong DUKE at the following email address: info@dejongDUKE.nl. In the event a User has (other) unresolved concerns, a User has the right to complain to the local data protection authority.
21. Users may verify that their Personal Data are accurate, complete and up-to-date by logging on to their accounts and rectifying or supplementing the Personal Data.
22. De Jong DUKE will remove the ConnectMe Server user accounts of the Buyer's employees if and when they cease to work for the Buyer and the Buyer has request De Jong DUKE to remove these Users in writing or Users have not logged on to ConnectMe for more than 6 months.
23. De Jong DUKE will remove the Buyer's Personal Data (not including information about the Product) if and when the Buyer's legal representative requests De Jong DUKE to do so.

CONFIDENTIALITY

24. The persons acting under the authority of De Jong DUKE, De Jong DUKE itself and anyone who has access to the Personal Data have a duty of confidentiality regarding the Personal Data which they interact with, unless required by laws and regulations to disclose any such information.

SECURITY

25. To prevent unauthorised parties from accessing your Personal Data, De Jong DUKE has imposed a variety of security measures, including measures against unauthorised access, unauthorised use, unauthorised alteration, unlawful and unintended destruction and unintended loss.

NON-PERSONAL BUSINESS INFORMATION

26. De Jong DUKE collects and uses non-personal business information for any manner of purposes. Business information, including the names of companies and institutions, that does not constitute Personal Data is stored in our database under 'organisation' or 'type of organisation'. Business information is used to identify allocated coffee machines.

27. Business information will be destroyed on the request of Buyer. This means that the information that has been collected can no longer be used to identify a particular business. De Jong DUKE will then only use this anonymized information for interpreting and analysing trends and further improving products and services.

AMENDMENTS TO THIS PRIVACY POLICY

28. De Jong DUKE reserves the right to amend its Privacy Policy, with due observance of the applicable laws and regulations. Amendments take effect as soon as De Jong DUKE publishes them via the ConnectMe web portal and the web APIs. Accordingly, De Jong DUKE advises Users to check regularly whether any changes have been made.

29. This Privacy Policy was last amended on 21 December 2023.