### **Privacy Statement**

We are aware that you trust us. It is our responsibility to protect your privacy. On this page you can read what data we collect when you visit our website, why we collect that data and how we improve your user experience on our website based on this data. That way we aim to increase your understanding of how we work and utilize the data.

This privacy policy applies to all services of Success Formula. You must know that Success Formula is not responsible for the privacy policy of other websites and other sources. By using our website you acknowledge to accept our privacy policy.

Success Formula respects the privacy of all the visitors/users of its website and ensures that all personal information shared with Success Formula will be dealt with in a strictly confidential manner. Our service is carried out in compliance with **Regulation (EU) 2016/679 of the** European Parliament and of the Council of 27 April 2016

### Who is collecting the data?

The data is collected by the owner of this website, namely Success Formula V.O.F., which is identified as follows:

Address: Grote Gracht 64, 6211SZ, Maastricht, The Netherlands

Phone number: +31(0)622597170 E-mail: info@successformula.nl

Chamber of commerce number (kvk): 69096945

### What data is being collected?

The following personal data is collected:

- Username
- Password
- Full name
- Physical address
- E-mail
- Phone number
- IP address (only attached per order)
- Behavior on our website (which pages are seen and how long) [tracking]
- Browser use to use our website [tracking]
- Device and operating system used to use our website [tracking]
- Network provider [tracking]
- HTTP Headers (Anything present in HTTP headers. HTTP Headers are a standard web protocol sent between any browser request and any server on the internet) [tracking]
- Button Click Data and additional values (any buttons clicked by site visitors, the labels of those buttons, any pages visited as a result of the button clicks, and potentially some data on the page before the click [e.g. the item price you add to your cart]) [tracking]

In all cases, your data is collected on our website and then stored on a database which is hosted on a secured third party server (leading cloud service provider).

In case you sign up for our email newsletter, your data will be collected from our website and then stored on a secured server from our marketing automation platform.

In case you accept our tracking cookies, your fully anonymized and aggregated data will be collected from our website and then stored on secured servers from Google, or Facebook (respectively for Google Analytics or Facebook Pixel). The secured server previously mentioned can only be accessed by Success Formula and their providers are compliant with the General Data Protection Regulation (GDPR) to the best of our knowledge.

We will not combine your personal data with any other data. Please see the "how is the data collected?" section to see when this information is collected from you and it if applies to you. Look into the "Why are we collecting your data" to understand the reason for the collection.

#### How is the data collected?

#### **Account Creation:**

While signing up on our website we ask you identification information as a username and a password.

## Order/Booking Creation:

While making an order we ask you identification information such as a username and a password (in case you do not already have an account) as well as your address, a phone number, and an e-mail address. Additionally, your current IP address is automatically attached to your order.

#### *Email/Whatsapp Newsletter sign-up:*

It is possible for you to sign up to our newsletter. In that case, we will request an email and/or phone number and name in order to personalize your newsletter and send it to you.

#### Contact forms:

In order to facilitate contacting us, multiple contact forms are available on our website. In order to answer you properly, we request an email address and your name plus any information that might help us answering you (e.g. any order number you have questions upon)

## Tracking cookie:

We use two tracking cookies on our website: Google Analytics and Facebook Pixel. For Google Analytics, your behavior will be tracked and the data will be sent to Google along with your browser, your device type, and its operating system. All those data are anonymized and impossible to track back to you (as it is aggregated by Google and anonymous). We do not combine this data with anything else.

For the Facebook Pixel, your behavior on our website is also tracked (given that you are logged into Facebook at the same moment of time). That way we can analyse the purchasing behavior and the performance of our Facebook Ads. The data collected by the Facebook pixel will only be used on an aggregate, and fully anonymized basis. We cannot identify individual customers. Further, we do not share any of your personal information that is collected on our website (e.g. e-mail, phone number) with Facebook (or any other third party).

# Why are we collecting the data?

All the data we collect are necessary in order to perform our service contract pursuant to letter b of article 6 GDPR.

- Username
  - o Collected for letting you log in your account
- Password
  - o Collected for letting you log in your account
- Full name
  - o Collected for identifying you with the tax authority (e.g. invoice)
  - o Collected for personalizing any newsletter we send you
  - Collected for personalizing any answer we send following your sending of a request via any of our contact forms
- Physical address
  - o Collected for identifying you with the tax authority (e.g. invoice)
- E-mail
  - Collected for identifying you with the tax authority (e.g. invoice)
  - o Collected for personalized any newsletter we send you
  - Collected for personalized any answer we send following your sending of a request via any of our contact forms
- Phone number
  - Collected for identifying you with the tax authority (e.g. invoice)
  - o Collected for personalized any newsletter we send you
- IP address
  - o Collected for maintenance and logging purpose
  - Collected to investigate in case you believe any order was not made by vourself
- Behavior
  - Collected to understand better how everybody uses our website and potentially tailor the website better in the future
- Browser
  - Collected to understand better how everybody connects to our website and potentially tailor it better in the future
- Device
  - Collected to understand better how everybody connects to our website and potentially tailor it better in the future
- Network provider

- Collected to understand better how everybody connects to our website and potentially tailor it better in the future
- HTTP Headers
  - Collected to understand better what the user is using to connects to our website and potentially tailor it better in the future
- Button Click Data and additional values Headers
  - Collected to understand better the user behavior on our website and potentially tailor it better in the future

### Will the data be shared with any third parties?

We will never share your information with any third parties except if the requesting third party is an (governmental) organization with a rightful claim upon your data. For example, the Tax Authorities could be asking for our invoices, which contains some of the personal data mentioned above.

### How long will the data be kept?

Your data is kept as long as it is needed from a legal point of view (7 years for the invoices). After this period, your data is still retained in case you decide to re-use your account at any point in time. However, you have the right to request a data deletion of data at which point we will fully remove all your data. Please see "What rights do I have it regarding the given data?" for more information on your rights. For the tracking data, we have set a 26 months period from your last visit on our website.

### What rights do I have regarding the given data?

The following rights are yours and can be called at any time.

- Right of Access (Art. 15 GDPR) -> You have the right to see any data that we have on you
- Right of Rectification (Art. 16 GDPR)-> You have the right to modify any data we hold from you
- Right of Erasure (Art. 17 GDPR) -> You have the right to be forgotten and ask us to delete your data (within the limit of the law, e.g. we cannot delete your data from a previous issued invoice)
- Right to Data Portability (Art. 20 GDPR) -> You have the right to receive your data in a structure and machine readable format

### How can you exercise the above mentioned rights?

For any data stored on our database for no newsletter purposes:

- Right of Access -> You can access all your data directly from your account page
- Right of Rectification -> You can modify all your data directly from your account page
- Right of Erasure -> You can lodge a request via this <u>form</u>. We will then confirm your identity with you via email and then proceed to erasing your data within our lawful capability.
- Right to Data Portability -> You can lodge a request via this <u>form</u>. We will then confirm your identity with you via email and then proceed to sending your data. The data format can be discussed together (e.g. CSV format or Excel format).

For any data stored on our database for newsletter purpose:

- Right of Access -> You can access all your data directly via link at the bottom of any newsletter
- Right of Rectification -> You can modify all your data directly via link at the bottom of any newsletter
- Right of Erasure -> You can delete all your data directly via link at the bottom of any newsletter
- Right to Data Portability -> You can lodge a request via this form. We will then confirm your identity with you via email and then proceed to sending your data. The data format can be discussed together (e.g. CSV format or Excel format)

For the data stored for analytics purpose on Google & Facebook, it is impossible for us or anybody else to know which data is yours as it totally anonymized and then aggregated by Google & Facebook.

### **Alterations**

This privacy policy is tuned to the current status of our website. Adjustments or changes on our website can lead to changes in the privacy policy. So we advise you to read our privacy policy on a regular basis.

#### **Ouestions and Feedback**

We check on a regular basis if we comply with the privacy policy. If you have questions about our privacy policy do contact us:

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