

## PRIVACY POLICY FLOORING ROW GROUP

### VERSION 1.00

This is the privacy policy of the 'Flooring ROW Group' (hereinafter "Flooring ROW Group" or "we").

This privacy policy is intended to inform you about the personal data that Flooring ROW Group collects via its websites, contact forms or data suppliers, to explain why we collect this data and how we deal with your data.

This privacy policy should be read together with the Flooring ROW Group's cookie policy.

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### 1 WHEN DOES THIS PRIVACY POLICY APPLY?

This privacy policy applies to the processing of personal data that Flooring ROW Group collects via its websites, contact forms or data suppliers, with the exception of personal data collected through the Flooring ROW Group jobsites in which case a separate privacy policy applies.

### 2 WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

The Flooring ROW Group<sup>1</sup> is responsible for the processing of your personal data. This means that the Flooring ROW Group determines for what purposes and with what means your personal data will be processed.

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<sup>1</sup> The Flooring ROW Group consists of the following companies: B&M NV (Brusselsesteenweg 149b, 1785 Merchtem, Belgium), Dynea NV (Moervaartkaai 7, 9042 Ghent, Belgium), IVC BVBA (Nijverheidslaan 29, 8580 Avelgem, Belgium), Mohawk Europe BVBA (Politieke Gevangenenstraat 44, 8530 Harelbeke, Belgium), Mohawk International Services BVBA (Ooigemstraat 3, 8710 Wielsbeke, Belgium), Unilin BVBA (Ooigemstraat 3, 8710 Wielsbeke, Belgium), Xtratherm SA (Rue Zénobe Gramme sn, 7181 Seneffe, Belgium), Unilin s.r.o. (Tovární 1, 682 01 Vyškov, Czech Republic), Unilin ApS (Bygaden 19, Folle, 8410 Ronde, Denmark), Unilin Finland OY (PB 57, 00811 Helsingfors, Finland), IVC France S.à.r.l. (130 Boulevard de la Liberté, 59000 Lille, France), Unilin Flooring SAS (7 Rue du Parc de Clany, 78000 Versailles, France), Unilin Panels SAS (7 Rue du Parc de Clagny, VERSAILLES, FR 78000, France), Unilin Insulation SAS (Avenue Gal de Gaulle, Tour De Bureau, 93118

The Flooring ROW Group has appointed a Data Protection Officer (“DPO”) who will be your point of contact for any questions regarding the processing of your personal data. The contact details of the DPO can be found under point 13 of this privacy policy.

### **3 WHICH PERSONAL DATA DO WE PROCESS ABOUT YOU?**

We collect your personal data in three ways:

#### *3.1 Information provided by you*

In the first place, we receive your information when you share it with us. This is e.g. the case when you fill in a form on our website or at a fair, if you request to receive a brochure or a sample, if you request to make an appointment in one of our showrooms or with one of our dealers, if you enter into a competition, if you sign up for our newsletter or a certain offer, etc.

In these cases, we usually receive information such as your name, e-mail address, telephone number, address details (street, number, postal code, city, and country), date of birth, the date of your appointment and other personal and/ or contact details.

We sometimes request you to provide us with your remarks, suggestions or other information regarding our websites, our products or services or our companies.

#### *3.2 Automatically obtained information*

When you browse our website, we receive data from cookie providers about your activity on our website such as the webpages you visit, the products you are interested in, etc. This information does not enable us to identify you directly. Therefore, we cannot know who you are merely based on the automatically obtained information. We can combine the automatically obtained information with the information provided by you.

More information on the use of cookies by the Flooring ROW Group can be found in our cookie policy.

#### *3.3 Information obtained from third parties*

Sometimes we also receive your information, such as information regarding your construction or renovation project, from affiliated companies or from professional data suppliers (e.g. Bisnode, construction fairs, etc.). By doing so, we usually receive data such as your name, e-mail address and your projects.

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Rosny Sous Bois Cedex, France), Unilin Insulation Sury SAS (Zone d'Activité Commerciale des Plaines, Rue de l'Orme, 42450 Sury Le Comtal, France), Unilin SAS (Zone Ind. CS Bazeilles 40913, 08209 Sedan Cedex, France), Moduleo GmbH (Reisholzer Wertstraße, 33, 40589 Düsseldorf, Germany), Unilin GmbH (Eupener Strasse 213, 52066 Aachen, Germany), Flooring Industries Limited S.à r.l. (10b rue des Mérovingiens, ZI Bourmicht, 8070 Bertrange, Luxembourg), Xtratherm Limited (Liscarton Industrial Estate, Kells Road, Navan (Co.Meath), Ireland), International Flooring Systems S.à r.l. (3, rue Thomas Edison, 1445 Strassen, Luxembourg), IVC Luxembourg S.à r.l. (Route de Winseler 26, 9577 Wiltz, Luxembourg), Mohawk International Holdings S.à r.l. (Rue des Mérovingiens 10, bus B, 8070 Bertrange, Luxembourg), Mohawk Operations Luxembourg S.à r.l. (10B Rue des Mérovingiens, ZI Bourmicht, 8070 Bertrange, Luxembourg), Mohawk Unilin Luxembourg S.à r.l. (10b rue des Mérovingiens, ZI Bourmicht, 8070 Bertrange, Luxembourg), Cevotrans BV (Beneluxstraat 1, 5061KD Oisterwijk, The Netherlands), Flooring XL B.V. (Beneluxstraat 1, 5061KD Oisterwijk, The Netherlands), Unilin Beheer BV (Hoogeveenenweg 28, 2913 LV Nieuwerkerk aan de IJssel, The Netherlands), Unilin Insulation BV (Beneluxstraat 1, bus 3, 5060 AA Oisterwijk, The Netherlands), Unilin Norway AS (Veritasveien 16, 1363 Hovik, Norway), Unilin Poland Sp.Z.o.o. (ul. Batalionów Chłopskich 14, 83-000 Pruszcz Gdański, Poland), Unilin Spain SL (CR Nacional II, KM 644, Edif Torre D'Ara, Planta 11, 08302 Mataro, Spain), Pergo (Europe) AB (Box 1010, Persakersvagen 18, 231 25 Trelleborg, Sweden), IVC Group Limited (Unit 5, Westside Park, Raynesway, Derby, United Kingdom, GB DE21 7AZ, United Kingdom), Unilin Distribution Ltd (Unit 6 Rampart Business Park, Rampart, Newry, GB , United Kingdom) and Xtratherm UK Limited (Park Road Holmewood Industrial, Park Holmewood, Chesterfield, Derbyshire, GB S425UY, United Kingdom).

#### **4 WHAT IS THE LEGAL GROUND FOR PROCESSING YOUR PERSONAL DATA?**

In general, the Flooring ROW Group processes your personal data for various purposes, which are further explained below. Regarding the processing of your personal data, the Flooring ROW Group always relies on:

- either, the consent that you expressed. In certain cases (e.g. in case of personalised information) we will request your explicit consent. In other cases, your consent can be expressed e.g. by ticking a box to this effect during your navigation on our site, or via another positive action from which your consent is inferred, e.g. by choosing to contact us via a contact form. In this case, you have the right to withdraw your consent for the future at all times;
- or, on another legal basis laid down by law: for example, if the collection of data is necessary for the performance of a contract with you or if processing is necessary for the fulfilment of a legal obligation to which the Flooring ROW Group is subject. In some cases, the processing of your data may also be necessary to realise a legitimate interest of the Flooring ROW Group. In this case, we will consider whether your interests or your fundamental rights and freedoms outweigh our legitimate interest.

If the Flooring ROW Group wishes to process your personal data for purposes which are incompatible with the purposes as set out below, the Flooring ROW Group will provide you with further information to this end.

#### **5 FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?**

##### *5.1 In order to provide you with personalised information and promotions based upon your profile if you have expressed your consent*

We process your personal data based on your consent to manage your participation in our competitions, activities or other promotional offers or to send you personalised information or advertisements.

For this purpose, we can process data such as [your name, your address, your e-mail address, your telephone number, your preferred language, the project or the region in which you are interested, and/or your credit card or other payment details].

In case of consent, we develop a profile based upon your purchase behaviour. In this profile, we take your preferences and interests into account, e.g. with respect to the products you have purchased and other products which might interest you. Based upon the information collected in the profile, we can send you general information and advertisements, information and advertisements concerning products that fit your profile or that might interest you. In each e-mail, you have the opportunity to unsubscribe. Furthermore, you are able to contact us regarding this topic at any given moment (see point 10 of this privacy policy with regard to your right to object).

Depending on the individual case, these data are processed based on your unambiguous consent, based on the performance of a contract to which you are a party, or based on your request to take steps prior to entering into a contract.

## *5.2 In order to answer your ordering request or to answer your questions or requests*

We process your personal data in order to answer your questions or requests (e.g. requesting a brochure, to supply you with a fact sheet of your favourite Flooring ROW Group products, to make an appointment with one of our dealers or in one of our showrooms). If you request an order, we will process your personal data in order to supply you with the products.

For this purpose, we can process data such as [your name, your company name, your e-mail address, your telephone number, your address, your correspondence with the Flooring ROW Group and all other personal data that you provide to us that can be relevant for answering your question].

Depending on the individual case, these data are processed on the basis of your request to take steps prior to entering a contract, on the basis of the performance of a contract to which you are a party, or on the basis of the Flooring ROW Group's legitimate interest in informing you about its activities.

## *5.3 In order to send direct marketing of the Flooring ROW Group*

We process your personal data in order to keep you informed of new information, campaigns, promotions regarding our brands and entities via e-mail, text message or mail (direct marketing). Moreover, we process your personal data to provide information regarding the features, services and products of the Flooring ROW Group. These data are processed based upon the Flooring ROW Group's legitimate interest.

For this purpose, we can process personal data such as [your name, your e-mail address, your telephone number and your address].

We aim to keep you informed of our products if you request to receive information or a sample, if you request to make an appointment with us or if you purchase our products. You prefer not to receive such information any longer? In each e-mail, you have the opportunity to unsubscribe. Furthermore, you are able to contact us regarding this topic at any given moment (see point 10 of this privacy policy with regard to your right to object).

## *5.4 For the technical and functional management of our websites*

We process personal data for the technical and functional management of our websites, in order to personalise the websites and to ensure that the websites is easy to use.

For this purpose, we can process data such as [your IP address, the pages you visit, the browser you use, the websites you visited earlier, geographical data such as your location, your preferred language and the time and duration of your visit]. We do this e.g. by using cookies.

Depending on the individual case, these data are processed based on your unambiguous consent or based on the Flooring ROW Group's legitimate interest in improving its websites and protecting it against cyber-attacks.

## **6 WHO HAS ACCESS TO YOUR PERSONAL DATA?**

The Flooring ROW Group is selective in the parties to whom it discloses your personal data and chooses them carefully. In all cases, we will ensure that sufficient safeguards for the protection and confidentiality of your data are in place.

In the following cases, we may share your personal data with third parties:

- Vendors (showrooms), distributors and dealers of the Flooring ROW Group e.g. to make sure that they are able to contact you to make an appointment.
- Certain processors who act on our behalf, such as e.g. marketing and communication companies.
- Affiliated companies, including our mother company Mohawk Industries Inc. and other affiliated companies of the Flooring ROW Group.
- Business partners such as third parties with whom we carry out joint promotions or programs.
- IT service providers that provide technical support.
- Payment service providers.
- Attorneys and external advisors: In certain cases, the Flooring ROW Group may transfer your personal data to attorneys and external advisors if this is necessary to give us advice or to defend our rights.
- Supervisory authorities: in certain cases, the Flooring ROW Group may transfer your personal data to police, judicial or other authorities if we believe that we are required to do so based upon the applicable legislation or regulation or based upon another lawful request or order.
- Possible acquirers of the company in the unlikely event that (a part of) our activities would be taken over by a third party

## **7 DOES THE FLOORING ROW GROUP PROCESS YOUR DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (“EEA”)?**

In some cases, your data may be shared with a third party outside the EEA for the purposes described in point 5 above.

In this respect, the Flooring ROW Group is committed to always ensuring an adequate and sufficient level of protection for your data, in particular by making sure that we can rely on an adequacy decision under article 45 GDPR, by concluding standard contractual clauses under article 46.2 GDPR or via any other appropriate safeguard.

If you have any questions or would like more information about the transfer of your personal data outside the EEA, you can send a dated and signed request to Unilin – Data Protection Officer, Ooigemstraat 3, 8710 Wielsbeke.

## **8 HOW ARE YOUR PERSONAL DATA PROTECTED?**

The Flooring ROW Group strives to protect your personal data as well as possible by means of administrative, technical and organisational measures. To this end, the Flooring ROW Group has developed several procedures which are implemented by our employees.

The Flooring ROW Group furthermore has committed to ensure that the service providers that process personal data on behalf of the Flooring ROW Group also implement sufficient technical and organisational measures.

## **9 HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

The Flooring ROW Group will retain your personal data for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

If no legal retention period applies, the Flooring ROW Group will process your data at least as long as it has a contractual relationship with you.

## **10 WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

Under the GDPR, you have a number of rights with regard to your personal data. Some of these rights have a very specific scope or are subject to special conditions or exceptions.

### *10.1 Right of access*

This means e.g. that you can ask us whether or not we process your personal data and for what purposes we do this. For more information, please consult article 15 GDPR.

### *10.2 Right to rectification*

You also have a right to obtain the rectification of inaccurate personal data. For more information, please consult article 16 GDPR.

### *10.3 Right to erasure*

In some cases, you can request us to erase your personal data e.g. when personal data is no longer required for the purposes for which we have collected it, when the personal data is processed based upon your consent and you withdraw your consent, etc.

In some exceptional cases, the Flooring ROW Group is not obliged to grant your request to erase your personal data. For more information, please consult article 17 GDPR.

### *10.4 Right to restriction of processing*

You may request a restriction of your personal data e.g. if you dispute the accuracy of your personal data, if the processing activity is unlawful, etc. A restriction of the processing means that we may only store your data temporarily, except in case you nevertheless consent to the processing of your data, in

the context of legal proceedings or in the public interest. A restriction can be terminated afterwards. For more information, please consult article 18 GDPR.

#### *10.5 Right to data portability*

If we process your personal data based upon your consent or based upon the performance of a contract, you can ask us to transfer your data to yourself or to another controller (if this is technically possible). In exceptional cases, the Flooring ROW Group is not obliged to follow up on your request. For more information, please consult article 20 GDPR.

#### *10.6 Right to object*

You can inform us of the particular reasons why you wish to object to the particular processing activity based upon the Flooring ROW Group's legitimate interest or in the context of the public interest. If these particular reasons outweigh our legitimate interests, we will terminate the processing activity. The Flooring ROW Group cannot follow up on your request when we process your personal data for the purposes of a legal claim. For more information, please consult article 21 GDPR.

#### *10.7 Right to object to the processing of your personal data for direct marketing purposes*

If we process your personal data for direct marketing purposes, you can always request us to stop processing your personal data without you having to give up a special reason. For more information, please consult article 21 GDPR.

#### *10.8 Right not to be subject to profiling*

The Flooring ROW Group will not process your personal data for profiling purposes unless you have given us your explicit consent (see points 4 and 5 of this privacy policy). For this reason, you have the liberty to choose whether or not you wish to receive personalised information and advertisements. In these cases, the Flooring ROW Group will ensure that you have the right to obtain human intervention or to express your point of view. For more information, please consult article 22 GDPR.

#### *10.9 Right to withdraw your consent at any time*

If the processing of your data is based on your consent, you also have the right to withdraw your consent at any time, without this affecting the legitimacy of the processing done prior to the withdrawal of your consent.

#### *10.10 Exercising the aforementioned rights*

Exercising the abovementioned rights can easily be done in different ways, such as by e-mail, by mail, by filling in the contact form on our website or by contacting our customer service in your favourite Flooring ROW Group store. For privacy and safety reasons, we may request proof of your identity.

#### *10.11 Competent supervisory authority*

In accordance with article 77 of the General Data Protection Regulation (GDPR), you have the right to lodge a complaint with the supervisory authority of your habitual residence, your place of work or the

place of an alleged infringement of the GDPR. The Belgian Data Protection Authority is the supervisory authority for Belgium and can be contacted at [commission@privacycommission.be](mailto:commission@privacycommission.be)

## **11 WHAT ABOUT LINKS TO OTHER WEBSITES AND SOCIAL MEDIA?**

The websites of the Flooring ROW Group can contain references (e.g. via hyperlinks) to other websites, which are offered by other companies or by social media. The Flooring ROW Group is not responsible for the processing of personal data via these websites. Nor does this privacy policy apply to these websites. The Flooring ROW Group advises you to check the privacy policies of these social media.

If you share content from the Flooring ROW Group websites via social media, your personal data will be visible for the visitors of these social media. The Flooring ROW Group is not responsible for the processing of personal data via these social media. Nor does this privacy policy apply to these social media.

## **12 HOW ARE YOU INFORMED OF CHANGES TO THIS PRIVACY POLICY**

This privacy policy was modified on 24/05/2018.

We strive to provide you with the best service. Therefore, this privacy policy can be modified. We thus advise you to check this privacy policy regularly on our websites. Any major changes will be announced via other communication channels.

## **13 WHO CAN YOU CONTACT IN ORDER TO EXERCISE YOUR RIGHTS?**

If you have any further questions or complaints about the processing of your personal data, about the Flooring ROW Group's websites or about this privacy policy you can always contact us:

- By e-mail at [info@ivcgroup.com](mailto:info@ivcgroup.com);
- By mail to:

Flooring ROW Group - Data Protection Officer  
Ooigemstraat 3  
8710 Wielsbeke  
Belgium