

Privacy Statement FLOW Duty Free B.V.

This Privacy Statement is effective as of November 2020.

At FLOW Duty Free B.V. ("FLOW Duty Free") we recognize the importance of protecting your personal data and are committed to processing it responsibly and in compliance with the EU General Data Protection Regulation (GDPR).

This Privacy Statement describes FLOW Duty Free's general privacy practices that apply to personal data we collect, use and share about consumers and other individuals within our clients, business partners, suppliers and other organizations with which FLOW Duty Free has or contemplates a business relationship. FLOW Duty Free respects the privacy of its customers and visitors to its websites. All personal data collected and used is secured and accessed by authorized personnel only. We are continuously improving our security controls to protect your personal data against unauthorized or unlawful processing and use, as well as against any accidental loss, destruction, damage, theft or disclosure.

Why and how we collect and use your personal data

We may collect your personal data as an individual for various purposes, such as the following:

- **Access and use of websites or other online services**

When entering one of our websites, or using an online service, FLOW Duty Free uses cookies which are necessary to the website's functioning and required to achieve the purposes as illustrated in this Privacy Statement. FLOW Duty Free will record information necessary to provide you with access, for the operation of the website and for us to comply with security and legal requirements in relation to operating our site, such as passwords, IP address and browser settings. We also collect information about your activities during your visit in order to personalize your website experience, such as recording your preferences and settings, and to collect statistics to help us improve and further develop our websites, products and services. When visiting one of our websites you can change or withdraw your consent to the use of cookies made upon your initial visit to our website.

- **Responding to your request for information, order, or support**

When you contact us (online or offline) in connection with a request for information, to order a product or service, to provide you with support, we collect information necessary to fulfil your request, to grant you access to the product or service, to provide you with support and to be able to contact you. For instance, we collect your name and contact information, details about your request and your agreement with us and the fulfilment, delivery and invoicing of your order. We retain such information for administrative purposes, defending our rights, and in connection with our relationship with you.

- **Contacting employees of our clients, prospects, partners and suppliers**

In our relationship with clients or prospects, partners and suppliers, they also provide us with business contact information (such as name, business contact details, position or title of their employees, contractors, advisors and authorized users) for purposes such as

contract management, fulfilment, delivery of products and services, provision of support, invoicing and management of the services or the relationship.

- **Visitor information**

We register individuals visiting our sites and locations (name, identification and business contact information) and use camera supervision for reasons of security and safety of persons and belongings, as well as for regulatory purposes.

- **Marketing**

Most information we collect about you comes from our direct interactions with you. We combine the personal data we collect to develop aggregate analysis and business intelligence for conducting our business and for marketing purposes. You can choose to receive information by email, telephone or postal mail about our products and services. Where we reference that we use your personal data in connection with a request, order, transaction or agreement (or preparing for the same), or to provide you with services that you requested, we do this because it is necessary for the performance of an agreement with you. FLOW Duty Free does not sell personal data to third parties. Also, FLOW Duty Free will not transfer the personal data you provide to third parties for their own direct marketing use.

- **Recruitment**

If you apply for a job at FLOW Duty Free then we process your personal data to facilitate the entire job application procedure on the grounds of our legitimate interests for recruiting. After the procedure we will delete your personal data within 12 months after the procedure for this particular job has ended, unless we have informed you that we require it for other purposes and you have given us explicit permission to do so. The following personal data can be processed for the job application procedure:

Any personal data that you provide through our job application form or otherwise including, but not limited to:

- o Full name, email address, phone number, picture, cover letter, résumé, LinkedIn profile and which job you have applied for.
- o Statuses, notes and planning related to your job application.
- o Email communications.
- o Assessment results.

Under the GDPR we are required to inform you that withholding personal data in your job application can give you a disadvantage in comparison to other candidates who are applying for the same role.

Children

FLOW Duty Free understands the importance of protecting children's privacy, especially in an online environment. In particular, our sites are not intentionally designed for or directed at children under the age of 16. It is our policy never to knowingly collect or maintain information about anyone under the age of 16, except as part of an engagement to provide professional services.

Sharing of personal data

Within our organization and between FLOW Duty Free controlled subsidiaries we only grant access to personal data on a need-to-know basis, necessary for the purposes for which such access is granted.

Where appropriate, FLOW Duty Free may also share your personal data with selected partners to help us provide you, or the company you work for, products or services, or to fulfil your requests, or with your consent. When selecting our suppliers and partners, we take into account their data handling processes.

Please be aware that in certain circumstances, personal data may be subject to disclosure to government agencies pursuant to judicial proceeding, court order, or legal process. We may also share your personal data to protect the rights or property of FLOW Duty Free, our business partners, suppliers or clients, and others when we have reasonable grounds to believe that such rights or property have been or could be affected.

International Transfers

The international character of FLOW Duty Free's business may involve a transfer of personal data between different subsidiaries, as well as to third parties located in the countries where we do business.

Information Security and Accuracy

We intend to protect your personal data and to maintain its accuracy. FLOW Duty Free implements reasonable physical, administrative and technical safeguards to help us protect your personal data from unauthorized access, use and disclosure. We also require that our suppliers protect such information from unauthorized access, use and disclosure. Despite FLOW Duty Free's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal data is limited to those who have a need to know. Those individuals who have access to the personal data are required to maintain the confidentiality of such information.

Retention Period

We will not retain personal data longer than necessary to fulfil the purposes for which it is processed, including the security of our processing complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defense of legal claims in the countries where we do business.

Your Rights and how to contact us

You can request to access, update or correct your personal data. You also have the right to object to direct marketing. Under the GDPR you may also have the right to request to have your personal data deleted or restricted. For any such request, you can contact us at privacy@flowdutyfree.com.

Changes to our Privacy Statement

From time to time we may update this Privacy Statement, as well as any other specific privacy statement. When making changes to this Privacy Statement, we will add a new date at the top of this Privacy Statement. We encourage you to periodically review this Privacy Statement to be informed about how FLOW Duty Free is protecting your personal data.



Right to Lodge a Complaint

FLOW Duty Free is committed to protecting your personal data. If you have questions or comments about our administration of your personal data, please contact us at privacy@flowdutyfree.com. You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Statement.

In any event, you always have the right to lodge a complaint with the Dutch regulator in charge of protecting personal data, the Dutch Data Protection Authority / De Autoriteit Persoonsgegevens (AP).