

# GENERAL PRIVACY POLICY UNILIN GROUP

This is the privacy policy of 'Unilin Group' (hereinafter '**Unilin Group**' or '**we/us**').

This privacy policy is intended to inform you about the personal data Unilin Group collects through its websites, contact forms or data providers, to explain why we collect that data and how we process your data.

This privacy policy should be read together with the cookie policy of each respective website in the footer of the website.

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## **1 WHEN DOES THIS PRIVACY POLICY APPLY?**

This privacy policy applies to the processing of your personal data (e.g. in the context of its websites), unless a more specific privacy policy is available.

This privacy policy does not apply if no personal data are processed by Unilin Group. This is the case, for example, for certain applications used by Unilin Group that do not collect personal data (such as the Quick-Step RoomScan app).

## **2 WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?**

The relevant entity of Unilin Group<sup>1</sup> that processes your personal data in the performance of its activities (for example, the entity with which you have entered into a contract, to which you have provided your personal data, whose website you visit, ...) is responsible for processing your personal data. This means that the Unilin Group determines the purposes and means for which your personal data will be processed.

Unilin Group has appointed a Data Protection Counsel who will be your point of contact for all questions related to the processing of your personal data. You can find the contact details of the Data Protection Counsel in section 13 of this privacy policy.

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

We collect your personal data in three ways:

### **3.1 INFORMATION PROVIDED BY YOU**

Firstly, we receive your information when you share it with us. This is the case, for example, when you fill in a form on our website (e.g. a brochure form, contact form, floor comparison form) or at a trade fair; when you request to receive a brochure or a sample; when you ask for an appointment in one of our showrooms or with one of our dealers; when you enter a competition; when you sign up for our newsletter or a particular offer; etc.

In such 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 ask you for comments, suggestions or other information about our websites, our products or services or our businesses.

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<sup>1</sup> Unilin Group consists of subsidiaries and affiliates of Unilin BV that together make up Flooring ROW, an up-to-date list of the legal entities that make up this can be requested by emailing [privacy@unilin.com](mailto:privacy@unilin.com).

### **3.2 AUTOMATICALLY OBTAINED INFORMATION**

When you browse our website or receive our newsletters, we receive data from cookie providers or social media by setting pixels (e.g. Facebook Pixel) about your activity on our website, such as the web pages you visit, the products you are interested in, whether you opened an e-mail or clicked on a link, etc. - We may combine the automatically obtained information with information provided by you to analyse your specific use of our website.

You can find more information on Unilin Group's use of cookies in our cookie policy on each respective website in the footer of the website.

### **3.3 INFORMATION OBTAINED FROM THIRD PARTIES**

Sometimes, we also receive your information from third parties, such as information from affiliates, dealers, suppliers, distributors, installers (e.g. through platforms such as the Quick-Step Connect web app), data brokers or from professional data providers (such as Bisnode, construction exhibitions, etc.).

In this case, we usually receive data such as your name, e-mail address, address details, phone number, information about your construction or renovation project, your order (of a sample) and/or your questions.

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

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

- your consent: you can express your consent by, for example, ticking a box about it when you surf our site, or through any other positive action that requires your consent, for example by choosing to contact us via our contact form. In some cases (e.g. regarding personalised information), we will ask for your explicit consent. You have the right to withdraw your consent for the future at any time.
- the performance of a contract: if the collection of personal data is required for the performance of a contract with you or to take pre-contractual measures.
- a legal obligation: if processing is necessary to comply with a legal obligation to which Unilin Group is subject.
- our legitimate interest: in some cases, the processing of your data may also be required to pursue a legitimate interest of Unilin Group. Where appropriate, we will consider whether or not your interests or fundamental rights and freedoms outweigh our legitimate interest.

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

Depending on the entity concerned, Unilin Group processes your personal data for the purposes listed below.

## **5.1 TO DELIVER THE PRODUCTS YOU ORDERED**

If you place an order through our website or through a retailer or installer, we will process your personal data to deliver to you the products or samples ordered. To this end, we may process data such as your name, the name of your company, your e-mail address, your telephone number, your address, your birthday, information about your projects, your correspondence with the Unilin Group.

This data is processed on the basis of your request for pre-contractual measures or on the basis of the performance of a contract to which you are a party or on the basis of Unilin Group's legitimate interest in executing its agreement with its vendors (retailers and suppliers) and providing you with excellent customer services.

## **5.2 TO ANSWER YOUR QUESTIONS OR OTHER REQUESTS**

We process your personal data to answer your questions or requests (e.g. request a brochure, send you an information sheet on your favourite Unilin Group products, make an appointment with one of our dealers or at one of our showrooms, etc.).

To this end, we may process data such as your name, the name of your company, your e-mail address, your telephone number, your address, your birthday, information about your projects, your correspondence with the Unilin Group.

We process this data based on the legitimate interest of the Unilin Group to best answer your questions and requests and to communicate with you.

## **5.3 TO DIRECT MARKETING FROM THE UNILIN GROUP**

### General direct marketing

We process your personal data to keep you informed about new information, campaigns and promotions related to our brands, entities, services and products, activities or other promotional offers, to ask your opinion about our products and services, to hear your feedback, to manage your participation in our competitions. We may send you direct marketing via e-mail, text message, telephone, social media (including but not limited to Facebook, WhatsApp, LinkedIn), our websites and affiliated websites or SMS. To this end, we may process your personal data, such as your name, address, e-mail address, telephone number, preferred language and the project or region you are interested in.

We may send you direct marketing based on your consent when you sign up for our direct marketing through our website. In this case, you are free to choose to provide us with your personal data for direct marketing purposes. You have the right to withdraw your consent to the processing of your personal data for direct marketing purposes at any time (see point 10).

We send you direct marketing based on our legitimate interest to keep you informed about our products when you purchase our products. In each e-mail, you can unsubscribe if you no longer wish to receive such information. We send direct marketing via social media to individuals with similar profiles based on our legitimate interest to promote our products. You have the right to object to the processing of your personal data for direct marketing purposes at any time (see item 10).

### Personalised direct marketing

We may also process your personal data to provide information regarding Unilin Group services and products or to send you personalised information or advertising. To this end, we process personal data such as your name, e-mail address, telephone number and address.

We may develop a profile based on your online behaviour or your purchasing behaviour. In this profile, we take into account your preferences and interests, for example with regard to the pages you visited, the links you clicked on, the products you viewed and the products you bought and other products that might interest you. We receive this information through cookies set on our website or through your previous purchase behaviour as reflected in your customer profile. Based on the information collected in the profile, we may send you information and advertising, information and advertising related to products that match your profile or that might interest you. Furthermore, we may use the services of third parties, such as Facebook, to identify target and "look-a-like" audiences to advertise our products to individuals with similar profiles. To this end, we may process your personal data, such as your name, phone number, address, e-mail address, date of birth, age, gender, your job, name of your company, your preferred language and specific products and services in which you have expressed an interest .

We may profile you and send you personalised direct marketing based on your consent when you accept cookies that collect this information. Please see our cookie policy for more information on cookies. You have the right to withdraw your consent to the processing of your personal data for direct marketing purposes at any time (see section 10).

You can find more information on Unilin Group's use of cookies in our cookie policy on each respective website in the footer of the website.

#### **5.4 TO ORGANISE COMPETITIONS AND KEEP YOU INFORMED OF THE RESULTS**

The Unilin Group may process your personal data when you participate in a competition organised by Unilin Group to keep you informed of the results.

To this end, we usually process personal data, such as your name, e-mail address or other contact details, financial data (such as the invoice of your purchase), photos, videos and other personal data relevant to determining the results of the competition.

We process your data as part of the organisation of the competition on the basis of your consent when you fill in the competition participation form. You have the right to withdraw your consent to the processing of your personal data at any time (see point 10).

#### **5.5 TO SUPPORT YOU IN YOUR RENOVATION PROJECTS THROUGH OUR SUPPLIER PLATFORM**

If you visit a seller (retailer or installer who distributes our products), the seller may create a consumer project for you on the platforms we make available to our sellers, such as the Quick-Step Connect web app. These platforms allow sellers to (i) provide you with information about the products you are

interested in, (ii) add your contact details to keep you informed about the project, (iii) upload photos of the room you want to renovate so they can show you what it might look like after the products have been installed, (iv) order a sample for you, (v) suggest matching accessories, (vi) automatically calculate the materials needed for the project and (vii) offer advice on finishing or preparing the project.

By offering our vendors these platforms, the Unilin Group processes your personal data. Unilin Group and its vendors thereof are jointly responsible for processing your personal data for this purpose. We recommend that you always consult your vendor's privacy policy in this regard.

Sellers create a consumer project through the platform and provide your personal data regarding the consumer project to Unilin based on your consent. You have the right to withdraw your consent to the processing of your personal data for direct marketing purposes at any time (see point 10).

Unilin Group will process your personal data for its own purposes to provide you with samples at home if you have requested this (see purpose 5.1).

To this end, we may process personal data such as your name, the name of your company, your phone number, e-mail address, address, consumer project details and additional notes about the project.

The processing of your personal data by Unilin in the context of creating a consumer project via the web app is necessary to take pre-contractual measures at your request and is based on the legitimate interest of the Unilin Group and its vendors to provide accurate information about the products to consumers. You have the right to object at any time to the processing of your personal data for visitor registration purposes (see item 10).

#### **5.6 TO REGISTER VISITORS TO OUR BUILDINGS OR SHOWROOMS**

The Unilin Group may process your personal data when you visit one of our buildings or showrooms. We register visitors to our buildings and showrooms to provide them with the Wi-Fi password via email, for security purposes (i.e. to provide them with a visitor's guide containing information on security and what to do in case of emergency) and to count how many visitors visit our buildings and showrooms.

To this end, we may process your personal data, such as your name, e-mail address or other contact details and the name of the Unilin employee you are visiting.

We process your data for visitor registration purposes based on our legitimate interest to keep our visitors safe, to know who visits our premises in case of emergency, to improve visitation and to keep track of how many people visit our premises and showrooms. You have the right to object at any time to the processing of your personal data for visitor registration purposes (see item 10).

#### **5.7 TO ANALYSE DATA AND CREATE STATISTICS**

The Unilin Group may process your personal data for analytical and statistical purposes. Statistical purposes are all operations to collect and process personal data necessary for statistical research or

the compilation of statistical results. Unilin Group uses various analytical tools to link personal data and obtain insights from different data sources.

To this end, we may process personal data, such as your name, e-mail address or other contact details or personal information.

Depending on the individual case, these data are processed based on the legitimate interest of the Unilin Group to assess and improve our marketing campaigns, gain insight into our sales reports and visualise our e-commerce data.

The result of processing for statistical purposes is aggregated data. We do not use the aggregated or your personal data to support measures or decisions relating to you.

#### **5.8 FOR THE TECHNICAL AND FUNCTIONAL MANAGEMENT OF OUR WEBSITES**

We process personal data obtained through cookies and other technologies for the technical and functional management of our websites, to personalise the websites and ensure that the websites are user-friendly. Your data allows us to monitor how our website is used and to improve its content and layout (e.g. A/B testing). This data also allows us to adequately secure our website.

To this end, we may process data such as your IP address, the pages you visit, the browser you use, the websites you have previously visited, geographical data such as your location, your preferred language and the time and duration of your visit.

The processing of this data is based on your unambiguous consent (obtained via our cookie banner) or on the legitimate interest of the Unilin Group to provide a well-functioning and secure website and to offer pages with relevant content for you.

You can find more information on how we use cookies in our cookie policy on each respective website in the footer of the website.

### **6 WITH WHOM DO WE SHARE YOUR PERSONAL DATA?**

The Unilin Group is selective about the parties to which it discloses your personal data and chooses them carefully. In any case, we will ensure adequate safeguards for the protection and confidentiality of your data.

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

- **Unilin Group sellers (showrooms), distributors, dealers, retailers and installers** - for example, to ensure that they can contact you to arrange an appointment, about your consumer project, .... In most cases, these parties are separate controllers and we recommend that you consult their privacy policies.
- **Processors** acting on our behalf, e.g. marketing agencies, communications companies, web hosting companies, mailing providers, software providers, analytics providers, tracking

companies (such as Lead Forensics),... Unilin Group enters into a processing agreement with the parties that have access to personal data for the provision of their services.

- **The various business units** of each Unilin Group entity, including our parent company Mohawk Industries Inc. and other Unilin Group affiliates, as defined in section 2 of this privacy policy.
- **Business partners** such as third parties with whom we run joint promotions or programmes.
- **IT service providers** providing technical support.
- **Payment service providers.**
- **Lawyers and external advisers:** in certain cases, the Unilin Group may disclose your personal data to lawyers and external advisers if this is necessary to give us advice or defend our rights.
- **Public authorities:** in certain cases, the Unilin Group may disclose your personal data to supervisory authorities or to police judicial or other authorities if we believe that we are required to do so under applicable laws or regulations or under any other lawful request or order.
- **Social media:** social media may have access to the information we collect using cookies and other technologies (possibly via plug-ins built into Unilin websites).
- **Potential buyers of the company:** in the unlikely event that all or part of our company is bought by a third party, your information will be passed on to the buyer.

## **7 DOES THE UNILIN 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. The Unilin Group is part of Mohawk Industries Inc., which is headquartered in the United States.

In this regard, the Unilin Group is at least committed to ensuring that your data is adequately and appropriately protected, in particular by ensuring that we can rely on a decision recognising protection as appropriate under Article 45 AVG, by entering into standard contractual clauses under Article 46.2 AVG or through other appropriate security measures , as stipulated in Chapter V AVG.

In all cases, your personal data will only be transferred to third parties in non-EEA countries if required or permitted under applicable privacy laws and only if such recipient provides appropriate safeguards to ensure an adequate level of data protection.

If you have any questions or would like more information about the transfer of your personal data outside the EEA, please send a dated and signed request to Unilin Group's Data Protection Counsel. You will find our contact details in point 13.

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

The Unilin Group strives to protect your personal data to the best of its ability through administrative, technical and organisational measures. To this end, the Unilin Group has developed various procedures, which are implemented by our employees.



The Unilin Group has also undertaken to ensure that service providers processing personal data on behalf of the Unilin Group also take adequate technical and organisational measures.

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

The Unilin Group will retain your personal data for the period necessary to fulfil the purposes described in this privacy policy. A longer retention period may be required based on a legal or contractual obligation or in the event of a dispute.

If you have any questions or would like more information about the retention of your personal data, please send a dated and signed request to Unilin Group's Data Protection Counsel. You can find the contact details in point 13.

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

Under the AVG, you have a number of rights in relation 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, for example, that you can ask us whether or not we process your personal data and for what purposes. Please refer to Article 15 of the AVG for more information.

### **10.2 RIGHT OF RECTIFICATION**

You also have the right to rectification of incorrect personal data. Please refer to Article 16 of the AVG for more information.

### **10.3 RIGHT OF REMOVAL**

In some cases, you can ask us to delete your personal data, for example when personal data is no longer required for the purposes for which we had collected it, when the personal data is processed on the basis of your consent and you withdraw your consent, etc.

In some exceptional cases, the Unilin Group is not obliged to comply with your request to erase your personal data. Please refer to Article 17 of the AVG for more information.

### **10.4 RIGHT TO RESTRICTION OF PROCESSING**

You may request restriction of the processing of your personal data, for example if you contest the accuracy of your personal data, if the processing activity is unlawful, etc. Restriction of processing means that we may store your data only temporarily, except if you nevertheless consent to the processing of your data in the context of legal proceedings or in the public interest. The restriction can be terminated afterwards. Please refer to Article 18 of the AVG for more information.

## **10.5 RIGHT TO DATA PORTABILITY**

If we process your personal data based on your consent or pursuant to the performance of a contract, you may ask us to transfer your data to yourself or to another controller (if this is technically possible). In exceptional cases, the Unilin Group is not obliged to comply with your request. Please refer to Article 20 of the AVG for more information.

## **10.6 RIGHT TO OBJECT**

You can inform us of the special reasons why you wish to object to the specific processing activity based on the legitimate interest of the Unilin Group or in the public interest. If those special reasons outweigh our legitimate interests, we will terminate the processing activity. The Unilin Group cannot comply with your request if we process your personal data for the purposes of legal proceedings. Please refer to Article 21 of the AVG for more information.

## **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 having to give a special reason. This right includes the right to object to profiling insofar as the profiling is related to such direct marketing. Please refer to Article 21 of the AVG for more information.

## **10.8 RIGHT NOT TO BE SUBJECTED TO PROFILING**

The Unilin Group may process your personal data for profiling purposes as described in section 5.3 of this privacy policy). As the profiling is only carried out for direct marketing purposes, you have the right to object to profiling for our direct marketing at any time, without having to give us a special reason (as set out in point 10.7). Please refer to Article 21 of the AVG for more information.

## **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 affecting the legitimacy of the processing prior to the withdrawal of your consent.

## **10.10 EXERCISING THE ABOVE RIGHTS**

The above rights can be easily exercised in various ways, such as by e-mail or post, by filling in the contact form on our website or by contacting our customer service department at your favourite Unilin Group shop. For privacy and security reasons, we may ask you for proof of your identity. You can find the contact details of the Data Protection Counsel in point 13.

## **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 normal place of residence, your place of work or the place of an alleged violation of the GDPR. The Belgian Data Protection Authority is the supervisory authority for the Unilin Group headquarters located in Belgium and can be reached at:

- Rue du Printing Press 35, 1000 Brussels
- Tel: +32 (0)2 274 48 00
- Email: [contact@apd-gba.be](mailto:contact@apd-gba.be).

You can contact other local supervisory authorities in:

<b>Netherlands</b> Personal Data Authority (AP)	(+31) - (0)70 - 888 85 00 <a href="mailto:info@autoriteitpersoonsgegevens.nl">info@autoriteitpersoonsgegevens.nl</a>
<b>Luxembourg</b> National Data Protection Commission / Commission Nationale pour la Protection des données (CNPD)	(+352) 26 10 60 -1 <a href="mailto:info@cnpd.lu">info@cnpd.lu</a>
<b>France</b> Commission Nationale de l'Informatique et des Libertés (CNIL)	+33 (0)1 53 73 22 22
<b>Spain</b> Agencia Española de Protección de Datos (AEPD)	+34 901 100 099 +34 91 266 35 17 <a href="mailto:dpd@agpd.es">dpd@agpd.es</a>
<b>Italy</b> Garante per la Protezione dei dati personali (GPDP)	+39 06.696771 <a href="mailto:protocollo@gpdp.it">protocollo@gpdp.it</a> +39 06,69677.2917 <a href="mailto:urp@gpdp.it">urp@gpdp.it</a>
<b>United Kingdom</b> Information Commissioner's Office (ICO)	+44 (0)303 123 1113
<b>Ireland</b> Data Protection Commission (DPC)	+353 (0)76 110 4800 +353 (0)57 868 4800 <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>
<b>Germany</b> Different by state	You can find the contact details of the various authorities at: <a href="https://www.datenschutzkonferenz-online.de/datenschutzaufsichtsbehoerden.html">https://www.datenschutzkonferenz- online.de/datenschutzaufsichtsbehoerden.html</a>
<b>Denmark</b> The data protection agency (Datatilsynet)	+45 33 19 32 00 <a href="mailto:dt@datatilsynet.dk">dt@datatilsynet.dk</a>
<b>Finland</b> Data Protection Ombudsman Services	For individuals: +358 (0)29 566 6777 For officials:

	+358 (0)29 566 6778 <a href="mailto:tietosuoja@om.fi">tietosuoja@om.fi</a>
<b>Norway</b> The data protection authority	+47 22 39 69 00 <a href="mailto:postkasse@datatilsynet.no">postkasse@datatilsynet.no</a>
<b>Sweden</b> Integritetsskyddsmyndigheten / Swedish Data Protection Authority (IMY)	+46 (0)8 657 61 00 <a href="mailto:imy@imy.se">imy@imy.se</a>

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

The Unilin Group websites may contain references (e.g. via hyperlinks, social plug-ins, links to social media operators) to other websites, provided by other companies or by social media. The Unilin Group always advises you to check the privacy policies of those websites.

### 11.1 SOCIAL MEDIA PAGES OF THE UNILIN GROUP

Unilin Group has pages on LinkedIn, Twitter, Facebook and Instagram. When you visit those pages, your data is transmitted to the operator of the respective social media network through the use of cookies. Social networks may receive information such as which websites you currently and previously visited and your IP address. When you visit those pages, we may receive aggregated data from the respective social network in the form of statistics on how our pages are viewed by social media users.

For the scope and purpose of data collection and further processing and use of the data by social networks and for information on rights and settings to protect your privacy, please refer to the privacy policies of those social networks (available here: [Facebook](#), [LinkedIn](#), [Twitter](#) and [Instagram](#)).

You can find more information on Unilin Group's use of cookies in our cookie policy on each respective website in the footer of the website.

### 11.2 OPTIONS FOR SHARING ON SOCIAL MEDIA

Our website allows you to share content on LinkedIn, Twitter, Facebook, Instagram, Pinterest, YouTube, Whatsapp and Snapchat. When you use these social plugin features (e.g. 'share' button,...), information about your usage is transmitted directly from your browser to the corresponding social network. If you are already registered with a social network while visiting our website, the operator of that social network can assign the visit to your personal account via the social plugins. If you are not yet a member of a social network, the social networks may still receive and store your IP address and information about the browser and operating system you are using via the social plugins.

If you share content from our website directly on the social media page, your personal data will be visible to the visitors of that social media. For the scope and purpose of data collection and further processing and use of the data by social networks, and for information on rights and settings to protect your privacy,

please refer to the privacy policies of those social networks (available here: [Facebook](#), [LinkedIn](#), [Twitter](#), [Instagram](#), [Pinterest](#), [YouTube](#), [Whatsapp](#) and [Snapchat](#)).

You can find more information on Unilin Group's use of cookies in our cookie policy on each respective website in the footer of the website.

## **12 HOW WILL YOU BE NOTIFIED OF CHANGES TO THIS PRIVACY POLICY?**

We strive to provide you with the best service. Consequently, this privacy policy is subject to change. We therefore advise you to check this privacy policy regularly on our websites. Any significant changes will be announced through other communication channels.

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

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

- Via the contact form on our website;
- By e-mail to [privacy@unilin.com](mailto:privacy@unilin.com);
- By post to:

UNILIN - Data Protection Counsel

Vredestraat 57 - 59

8790 Waregem

Belgium