

Privacy policy for the Into Basket platform

1. Introduction

The controller for your personal data is SRL EDESSTA (hereinafter “**Edessta**”, or “**we/us**”), a company whose registered office is at Rue Brogniez 172a, 1070 Anderlecht, and which is registered in the Crossroads Bank for Enterprises under number 0762.624.490.

Edessta conducts its business under the commercial name “Into Basket”. We have set up a platform with the same name (hereinafter the “**Platform**”, comprising a website, an Android application and an IOS application) to offer food product delivery services to our customers. Edessta can be contacted in the following ways:

- By email: claims@intobasket.com
- By post: Rue Brogniez 172a, 1070 Anderlecht

2. Processing your personal data

When you visit or use the Platform, Edessta will process personal data concerning you. The term “**personal data**” is used to indicate any information concerning an identified or identifiable physical person. Through this policy, Edessta, as data controller, wishes to provide information to any physical person whose personal data it collects and processes. This includes your name, your telephone number, your address, and any information that identifies you.

All the data processing performed by Edessta is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council 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, known as the General Data Protection Regulation (hereinafter the “**GDPR**”).

3. How do we collect your personal data?

We collect your personal data when you use our Platform and in particular when you communicate your data directly to us via the Platform:

- When creating your Customer Account;
- When you contact us to ask questions.

We also collect your personal data via social media when you take part in giveaways we organize on those sites.

4. What types of personal data does Edessta collect?

At Edessta, we ensure that your personal data is processed in accordance with the applicable legislation and in a way that is appropriate and limited to what is necessary for the intended purpose.

The personal data concerning you which Edessta collects and processes is as follows:

- Identification data: such as your surname, first name, etc.

- Contact data: postal address, email address, telephone number, your pseudonym if you contact us via social media, etc.
- Customer data: your customer number, your loyalty points, etc.
- Data concerning your online purchasing behaviour: your customer profile or customer segment that emerges from analysing your purchases (e.g. wine lover, vegetarian, etc.), your use of promotions and loyalty points, etc.
- Electronic data: the device you use, your IP address, the operating system and platform, the date and time you visit the site, etc.
- Data concerning your online behaviour: opening emails, taking part in giveaways, online purchases, using the Platform, using your customer account, the products you view, etc.
- Your activity relating to subscribing to or unsubscribing from our marketing communications.
- Transaction data, including the bank card number, its expiry date, and the date and amount of the transaction.
- Data obtained following our communications with you (for example, regarding complaints, questions or comments).

We do not collect and do not process special categories of data unless we receive your explicit consent to do so. We may, for example, retain and use data concerning allergies if you communicate such data to us when you contact our customer service department on the subject of allergens.

5. For what purposes do we process your data and on what legal bases?

We process your personal data for the following purposes:

- To enter into a contract with you,
- To provide you with information on our products and services,
- To manage the entire purchase process, including enabling you to make payments via the Platform,
- For the technical management of our Platform and to improve our Platform,
- To manage our customer service and therefore to respond to your questions and/or complaints,
- To improve the quality of our products and services,
- To communicate with you following a request from you,
- To suggest products and services that may be of interest to you,
- To send you our newsletter,
- For marketing purposes specific to our company,
- To organise games/competitions and prize draws in this regard (and to inform you of the results), and
- To fight against violations and fraud.

In general, Edessta collects and uses your personal data for specific, explicit and legitimate purposes, and it will not use such data for future purposes which are not compatible with the initial purposes.

The legal bases that enable us to process your personal data are as follows:

- **Legitimate interest.** In certain situations, data processing is necessary for the legitimate purposes pursued by Edessta. In such cases, we will ensure that your

interests, freedoms and fundamental rights do not prevail over the interests of Edessta.

- **The need for processing to perform a contract.** Your personal data is processed by Edessta to perform a contract which you have entered into with Edessta, or to take steps at your request prior to entering into a contract.
- **Consent.** Edessta will seek your consent to use your personal data for specific purposes (for example, so that we can send you electronic marketing communications through newsletters, text messages, social media, etc.)
- **Legal and regulatory obligations.**

Where we process your personal data on the basis of your consent, you have the right to withdraw this consent at all times.

Where we process your data for marketing purposes, you may at all times oppose such processing, including the related profiling.

You will find further information on your rights in Article 8.

6. With whom do we share your data?

Access to your personal data is limited to the staff members who need access to such data as part of their duties within Edessta. The staff members concerned are obliged to keep your personal data confidential and must comply with the technical instructions imposed by Edessta in this regard.

Edessta may also be required to send your personal data to external service providers. Such transfers of data take place only where necessary for the purposes for which the personal data is processed. We guarantee that these service providers only have access to your data to the extent necessary for them to perform their duties. We also guarantee that these service providers are bound by an obligation of confidentiality and that they will never use your personal data for their own purposes.

These external service providers are the following:

- Our IT subcontractor Technoduce Info Solutions Pvt Ltd, JV Building, 2/3 & 2/4 Mullai Nagar, Maruthamalai Main Road, Vadavalli, Coimbatore, 641041, Tamil Nadu, India;
- Our payment service provider Ingenico Financial Solutions NV/SA, Da Vincilaan 3, 1930 Zaventem, Belgium;
- Other digital providers, such as Amazon (which hosts our servers) and the social media companies through which we obtain personal data, for example, when you take part in giveaways we organize on those sites, and in particular:
 - Instagram: Social network; Service provider: Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA, Mutterunternehmen: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.instagram.com>; Privacy Policy: <https://instagram.com/about/legal/privacy>.
 - Facebook: Social network; Service provider: Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, parent company: Facebook, 1 Hacker Way, Menlo Park, CA 94025, USA; Website: <https://www.facebook.com>; Privacy Policy: <https://www.facebook.com/about/privacy>; Opt-Out: Settings for advertisements: <https://www.facebook.com/settings?tab=ads>.

- LinkedIn: Social network; Service provider: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland; Website: <https://www.linkedin.com>; Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>; Opt-Out: <https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>.
 - Twitter: Social network; Service provider: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07, Ireland, parent company: Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA; Privacy Policy: <https://twitter.com/de/privacy>, (Settings) <https://twitter.com/personalization>.
 - YouTube: Social network and video platform; Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; Privacy Policy: <https://policies.google.com/privacy>; Opt-Out: <https://adssettings.google.com/authenticated>.
- Our self-employed deliverers;
 - Certain regulated professions, such as lawyers, notaries or auditors.

We are sometimes required to transfer personal data concerning you. This is the case where a law, a regulation or court proceedings (such as a legal decision) require us to do so: at the request of the authorities or the police in connection with actions required by law. It is also possible that we may believe it is necessary or desirable to transmit your data to prevent physical harm or financial damage, or in the event of an inquiry into a suspected or proven fraud or into illegal activities.

We also reserve the right to transmit all your personal data in the event of the sale or transfer of all or part of our activities or assets. In such cases, we undertake to do everything in our power to ensure that the buyer uses your data in accordance with this Privacy Policy. If such a sale or transfer should occur, you will be able to contact the buyer to raise any questions you may have about the processing of your data.

7. Transfer of data abroad

Some data may be transferred to third parties situated outside the European Economic Area (“EEA”) which will be able to process the data on our behalf and in accordance with our instructions. For example, your data will be processed by our service provider Technoduce Info Solutions Pvt Ltd in India.

Where your data is transferred to a country situated outside the European Economic Area (“EEA”), and where the level of data protection in that country is deemed inadequate by the European Commission, we have the necessary guarantees in place to protect your data (we generally use the standard contractual clauses of the European Commission). In this way, we ensure that the data we send to third countries is adequately protected.

To obtain a copy of these clauses or to find out how to access them, please contact us in writing.

8. Security and confidentiality

Edessta undertakes to take all appropriate technical and organisational steps to protect the collected information and data against destruction, loss, unintentional changes, damage, accidental or unauthorised access, or any other unauthorised data processing.

To ensure this security, Edessta has adopted measures such as installing firewalls and implementing access controls, logs and backups.

9. Your rights

At all times, you have specific rights which you can exercise concerning the processing of your data. An overview and a description of these rights can be found below. To exercise these rights, please contact Edessta:

- By email: claims@intobasket.com
- By post: Rue Brogniez 172a, 1070 Anderlecht

1. You have the **right to access** your data at all times.

2. You have at all times the right to **erase** or **rectify** any data that is inaccurate, incomplete, inappropriate or obsolete, and the right to have your data **deleted**.

3. In certain situations defined by law, you have the **right to oppose** the processing of your data and to limit the processing of your data, and the right to withdraw the consent you have previously given for specific processing of your data.

Where you exercise your **right to restrict** or to **object to** the processing or to **withdraw your consent**, we ask you to indicate clearly which processing you oppose or which consent you wish to withdraw.

We wish to draw your attention to the fact that opposing or restricting certain types of processing or withdrawing your consent to certain types of processing of your data may mean that you are no longer able to use some of the products or services we offer.

4. You also have the right to request the **portability** of your data where Edessta processes your data, provided by you, on the basis of your consent or where it is processed in connection with performing the contract between you and Edessta, and where this processing is performed entirely via an automated process.

5. If you wish to exercise your rights, we ask you to provide proof of your identity in order to prevent any unauthorised disclosure or use of your data. We therefore ask you to attach a copy of the front of your identity card to your request. This copy will be used by us solely to implement the rights you are exercising. For your security when sending information by email, we also recommend that you conceal your card number (or any other document number if you use an alternative form of proof) and your identity photo.

6. For the sake of completeness, we also wish to inform you of your right to lodge a complaint with the *Autorité de protection des données* [Data Protection Authority] if Edessta fails to respond to your request to access your data, or if Edessta refuses your request, or if our response fails to meet your expectations. You also have this right if you consider that the processing of your data by Edessta is unlawful.

The *Autorité de protection des données* can be contacted as follows:

- Email: contact@apd-gba.be

- Telephone number: +32 (0)2 274 48 00
- Fax: +32 (0)2 274 48 35
- Website: <https://www.autoriteprotectiondonnees.be/>

10. Cookies

Cookies are small files saved on your device which store certain settings and data elements to enable exchanges with our system via your browser. In principle, there are two types of cookie: session cookies, which are erased as soon as you close your browser, and temporary/permanent cookies which are stored on your device for a longer period of time or permanently. Storing cookies in this way helps us to manage our site and our offers and makes it easier for you to use our site by, for example, storing certain data elements to save you from having to enter them each time.

Most of the cookies we use are automatically erased from your hard disk when you close your browser (end of session, hence so-called session cookies). Session cookies are used, for example, to offer you the basket function on several pages. We also use cookies installed on your hard disk. At your next visit, you will be recognised automatically, along with the data you have entered and your preferred settings. These temporary and permanent cookies (lasting between one month and 10 years) are stored on your hard disk and are erased automatically after the defined period. These cookies help to make our site more welcoming, more efficient and more secure. Cookies are used exclusively to tailor our offer to customer wishes and to allow you to browse our site as efficiently as possible.

Pseudonym data alone is recorded in the cookies used by Edessta. When the cookie is activated, it is allocated an identification number which does not affect your personal data in any way. Your name, your IP address, or any similar data that would allow the cookie to be assigned to you directly are not recorded in the cookie. Based on cookie technology, we receive only pseudonymised information, concerning, for example, the pages in our store which you have visited, the products you have viewed, etc.

You can configure your browser in such a way that you control whether cookies are accepted and to block other cookies in the future. If you want to accept cookies from Edessta but not those from our providers and partners, you can select “Block third-party cookies” in your browser. In general, the help function in your browser’s menu bar will show you how to reject new cookies and block previously accepted cookies.

11. Storage period

We do not store your personal data any longer than is necessary for the purposes for which it has been retained. We use the purpose as one of the criteria for defining how long the data needs to be retained. Other criteria may include our legal data or information retention obligations or the length of time we have had a commercial relationship with you or have been supplying services to you.

At the end of the defined retention period, we undertake to erase, destroy or anonymise the data securely.