

Enrico Food B.V. (hereinafter 'Enrico Food') is committed to protecting your privacy and any personal data you share with us. As part of this effort, Enrico Food processes personal data in accordance with the EU's General Data Protection Regulation (GDPR) and other data protection regulations applicable to us. Accordingly, we have developed this privacy statement in order for you to understand how we collect, use, communicate, disclose and otherwise make use of personal data. We have outlined our privacy statement below. Please read this privacy statement carefully.

## 1 WHO IS ENRICO FOOD AND HOW CAN YOU CONTACT US?

The party responsible for the processing of your personal data (the data controller) is Enrico Food, a company having its address at Rijnkade 8, 1382 GS Weesp, the Netherlands. Enrico Food is registered with the Chamber of Commerce in the Netherlands under the name "Enrico Food Products touched by the sun" under number 33267335. All questions regarding the processing of personal data by Enrico Food can be addressed to [welcome@enricofood.nl](mailto:welcome@enricofood.nl).

Enrico Food owns the brands:

- Bertolli
- Jean Bâton

Enrico Food works with the following partner brands. This privacy statement also applies when you approach Enrico Food about these brands.

- Delizioso
- Laurieri
- Costa Ligure
- Royal mediterranean
- Maldon Salt
- Urbani Tartufi
- Principato di Luendio
- Castellino
- Mangiare
- Peppadew
- Glas Best

## 2 TO WHOM DOES THIS PRIVACY STATEMENT APPLY?

This privacy statement is relevant to you if you

- visit [www.Enricofood.nl](http://www.Enricofood.nl), [www.bertolli.nl](http://www.bertolli.nl) and [www.jeanbaton.nl](http://www.jeanbaton.nl) (hereinafter the "Websites");
- contact us;

- participate in our promotional actions;
- apply for a job with us.

### 3 HOW DOES ENRICO FOOD PROCESS YOUR PERSONAL DATA?

Below you will find an overview of the **types of data processing** executed by Enrico Food and the **purposes** for which Enrico Food processes your personal data. In this overview, Enrico Food indicates the **personal data** Enrico Food uses for a specific purpose, what the legal basis is for processing these data, and how long Enrico Food **stores** the data.

#### Website

When you visit the website [www.jeanbaton.nl](http://www.jeanbaton.nl) we collect technical information in order for this website to function optimally and to display information in the desired way. We collect the date and time of your visit, your IP address, MAC address or other unique number, the browser used, the web pages you visit on these websites and other log information (such as the URL referrer and the country of the IP address). The processing of this personal data is necessary to pursue our legitimate interest, which is to ensure the optimal functioning of this website (Article 6.1(f) GDPR). We retain this personal data for 1 month after your last visit to this website.

We also use cookies. More information about the personal data Enrico Food processes when you visit this website can be found in the Cookie Statement [[www.jeanbaton.nl/cookies](http://www.jeanbaton.nl/cookies)]

Enrico Food requires this information in order for the Website to work as optimally as possible (for example, to display content correctly and to keep the Websites secure). The processing of these personal data is therefore necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR) and are stored for one month. In cases where cookies have a high impact on your privacy, we will ask for your consent (Article 6.1(a) GDPR).

#### Apply for jobs at Enrico Food

When you apply for a job at Enrico Food, we process your personal data (including contact information, CV and cover letter) solely to determine your eligibility for the position to which you have applied or, in the case of an open application, to determine your eligibility for a position within Enrico Food. We store the personal data of applicants during the recruitment and selection procedure. We delete the personal data (in the event of rejection) no later than four weeks after the application process is completed. With your consent, we may retain your data for up to one year after completion of the application process, in order to

contact you if a potentially suitable position becomes available at a later date.

The processing of these personal data is based on your consent (Article 6.1(a) GDPR). The processing of these personal data is also necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR). That interest in this case consists of recruiting suitable new staff and screening applicants.

**Handling quotes, making offers**

On our Websites and offline, you may request a quote or offer for our products. We will ask you to provide your first name, last name, email address, phone number, your question and the subject of your question. We will process these types of personal data in order to provide you with a quotation or offer.

The processing of your personal data in this context is necessary to take pre-contractual measures (Article 6.1(b) GDPR) and allow you to enter into a contract with us.

Enrico Food stores your personal data for as long as necessary to provide you with our services, with a maximum of one years.

**Customer services, handling complaints**

In order to provide customer service, Enrico Food may collect your personal data to respond to your questions you submit through email, phone or the contact form on the Websites, including helping you with any issues which may arise regarding our Websites and/or services.

Enrico Food processes your personal data in order to handle your complaints and (potential) claims. For this purpose we may process the personal data you provide via the contact form on the Websites such as first name, last name, email address and phone number, as well as all information that relates to the complaint or claim.

The processing of these personal data is necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR), namely being able to serve you efficiently and to optimize Enrico Food's customer service.

Your personal data is stored for a period of one month after responding to your message or handling your question. In case of complaints or claims we may process your personal data up to a year after the complaint or claim has been settled in full and procedures are final.

**Newsletters**

Enrico Food wishes to inform you on the developments of its products and services. We may send our existing customers - who have placed an

order with us - our newsletter and/or other marketing communications that relate to our products and services.

If you are not a customer (yet) and you are interested in our newsletters and/or other marketing communications, you can subscribe and opt-in for such mailings.

Any recipient of our newsletters and marketing communications may at any time unsubscribe (opt-out) for such communications.

In order to provide you with our newsletters and marketing communications we process your email address. Furthermore, we may process additional information such as purchase history in order to tailor our communications to your interests.

If you are a customer, the processing of your personal data is necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR), namely direct marketing. If you are not a customer, we process your personal data based on your consent (Article 6.1(a) GDPR).

Enrico Food retains your email address for as long as you are subscribed to the newsletter and no longer than one month after you unsubscribe.

#### **Promotional actions**

From time to time, Enrico Food organizes promotional actions for its brands. The personal data that Enrico Food collects in the context of these give aways are variable. This can be the first name, last name, address, email address phone number and the Enrico Food products you purchased, the date you purchased these products and photo and/or video recordings of price winners. Enrico Food stores this personal data for as long as the duration of the give away and as long as needed to award prizes from the promotional actions to it's price winners.

The processing of these personal data by processing photo and/or video recordings of price winners is based on your consent (Article 6.1(a) GDPR).

The processing of these personal data is based on performance of a contract (Article 6.1(b) GDPR), namely our agreement with you regarding the terms of the promotional action.

The processing of these personal data is necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR), to generate statistics and insights based on aggregated data and to be able to contact you if you win a prize.

## **Email tracking**

Enrico Food included email tracking and link tracking features in its emails by embedding a small transparent image pixel in the outgoing email. If the email is opened, Enrico Food has access to certain information, such as the name and surnames of the recipient, the recipient's email address, subject of the email, date and time in which the email was sent, confirmation that the recipient received the email, confirmation that the recipient has opened the email after it has been received, timestamp of each email opening, the history of the times (number, date and time) the recipient has opened the received email, IP address (an unique number, which makes it possible to recognize your device) from which the email was opened, browser and operating system used by the recipient who opened the email, number of links included in the email, text and URL of such links, number of clicks made on each of them by the recipient, timestamp of each click on the link, IP address from which the link was clicked on and browser and operating system used by the person who has clicked on the link.

The processing of these personal data is necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR), namely to analyse the reach and effectiveness of the emails send by Enrico Food. The information is retained for two months.

## **Internal control, security and statutory obligations**

Enrico Food processes personal data in order to secure its systems and data and protect company assets. Furthermore, Enrico Food may process personal data in order to comply with statutory obligations and requests of authorities and to avoid and settle claims. For these purposes, Enrico Food may process all types of personal data as described in this privacy statement for these purposes.

The processing of these personal data is necessary for the purposes of the legitimate interests pursued by Enrico Food (Article 6.1(f) GDPR), namely security and business interests of Enrico Food. Furthermore, Enrico Food may have to process personal data to meet with statutory requirements as provided by Article 6.1(c) GDPR. Your personal data will be retained as long as needed for these purposes or as prescribed by specific statutory obligations.

## **4 DOES ENRICO FOOD SHARE YOUR PERSONAL DATA?**

Your personal data are only accessible to people at Enrico Food authorised to access them on a 'need-to-know' basis. We will only disclose your personal data if and to the extent described in this privacy statement or when necessary in order to satisfy our statutory obligations, to protect our rights or someone else's rights as well as to enforce compliance with this privacy statement.

We may share your personal data with third party service providers that process personal data on behalf of Enrico Food (data processors). The processing by service providers is governed by a so called data processing agreement in which Enrico Food has ensured that that the service provider shall only process the personal data on instructions of Enrico Food.

Third parties are:

- external hosting providers, including cloud providers for the storage and management of data;
- other specific tasks that have been outsourced which may include for example IT support.

In addition, regarding shipment of goods Enrico Food may provide your personal data to logistic parties with the aim of performance of a contract. Enrico Food also may provide your personal data to governmental authorities if Enrico Food is obliged to do so on the basis applicable laws and / or regulations or by means of a court order or a legal verdict.

Regarding to the give aways Enrico Food may share personal data of prize winners such as name, last name and address with partners that Enrico Food provide with the prizes that can be won in the various give aways, with the aim that these partners can send the prizes to the price winner or to draw up a contract with the prize winner, for example in the context of a lease contract won by the price winner. Furthermore Enrico Food uses the omnichannel MessageBird to run various give aways.

On the Websites, Enrico Food does use Google Analytics (part of the American company Google) to improve the Websites. This is set up in a privacy-friendly manner. Your personal data is not shared with Google Analytics, Google Analytics only analyses anonymous visitor data.

Our Websites contain hyperlinks to other websites. [www.bertolli.nl](http://www.bertolli.nl) and [www.jeanbaton.nl](http://www.jeanbaton.nl) also contain hyperlinks to social media channels such as Facebook, Instagram, YouTube and Spotify. These hyperlinks are used by third parties to collect your personal data. Enrico Food is not responsible for the content, privacy and security of such websites and social media channels. These websites and social media channels are not covered by this privacy statement and we therefore recommend that you carefully read the privacy and cookie statements on those websites an social media channels that apply to this processing of your personal data by these third parties.

## 5 WHAT ARE YOUR RIGHTS?

Under the GDPR, you have a number of rights with regard to your personal data and the processing thereof:

**Right to access** You can ask Enrico Food whether Enrico Food processes your processes your personal data and, where that is the case, access to your personal data and additional information about the processing of your personal data.

**Right to rectification** You have the right to request the rectification of inaccurate personal data concerning you.

**Right to be forgotten** You have the right to ask us to erase your personal data (right to be forgotten) for example if the personal data are no longer necessary in relation to the purposes for which they were collected, you withdraw consent on which the processing is based and where there is no other legal ground for the processing, or the personal data have been unlawfully processed.

**Right to restriction** You have the right to obtain restriction of processing of your personal data, for example when you have contested the accuracy of your personal data.

**Data portability** You have the right to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where the processing is based on your consent or on a contract.

**Right to object** You have the right to object to processing of personal data which is based on our legitimate interests. We shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.  
Where personal data are processed for **direct marketing** purposes, you always have the right to object to processing of personal data for such marketing. In that case, we shall no longer process your personal data for such purposes.

**Withdraw consent** Where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

You may send your request to [welcome@enricofood.nl](mailto:welcome@enricofood.nl). Enrico Food shall respond to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. Enrico Food shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

## 6 COMPLAINTS

If you have questions or complaints about the way Enrico Foods handles your personal data, you can contact us via [welcome@enricofood.nl](mailto:welcome@enricofood.nl). We will be happy to find a solution. If we cannot find an amicable solution and you still have complaints relating to the processing of your personal data, you can submit such complaint to the Dutch Data Protection Authority (AP), which supervises compliance with privacy laws and regulations.

## 7 AMENDMENTS

Enrico Food may amend this Privacy Statement from time to time. The amended Privacy Statement will be published on the Websites with an indication of the date on which the changes take effect. If there are subsequent substantive or material changes that may affect one or more of the parties involved to a considerable extent, we inform those involved in advance. This privacy statement was last amended on September 2023.