

DATA PRIVACY POLICY

Technical Lubricants International B.V. (herein referred to as “TecLub”, the “Company”, “we”, or “us”) is a leading ISO 9001:2015 certified private label producer of lubricating oils, greases, brake fluids, coolants, fuel, radiator and motor oil additives and a full range of automotive specialty products. Since 1988 TecLub cooperates on a confidential basis with well-known oil companies, importers, distributors and wholesalers in the automotive industry.

We are firmly committed to protecting your privacy. TecLub has created this data privacy policy (“Privacy Policy”) to explain our commitment to keeping personal data private and secure. In this privacy policy, we clarify which personal data we collect and for what purpose.

Personal data means any information that relates to an individual to the extent that any individual is or can be identified from that information. Personal data can be in any form (e.g., paper, electronic, video, audio). It is TecLub’s policy to take all necessary steps to ensure that all personal data processed by us is processed fairly and lawfully.

All of our employees, data processors and third party service providers who have access to personal data are obliged to respect the confidentiality of personal data and comply with this privacy policy.

The following topics are covered in this Privacy Policy:

- **scope**
- **information collection and use**
- **use of cookies**
- **disclosure**
- **security**
- **data retention**
- **policy changes**
- **contact information**

Scope

This Privacy Policy applies to all non-public, online and offline, collected, stored, processed, transferred and used personal data of TecLub’s customers, vendors, employees, agents, contractors and others who share their personal data with us. A copy of this privacy policy is located on our website at www.teclub.nl.

Information collection and use

There are various methods by which TecLub collects personal data. We may collect personal data from individuals as voluntarily disclosed via our websites, in person, over the phone or e-mail. Our collection of personal data is done with a commercial interest.

Where we collect personal data, we make clear the nature of the information and the specific purpose(s) for which it is used, or may be used, and we offer individuals the choice to opt-out of providing such information.

- **Sending of periodic newsletter:**

We offer a newsletter with which we would like to provide interested parties with information concerning our products and/or services with commercial and knowledge sharing intent. Your email address will

only be added to the subscribers' list with your express consent. Every newsletter contains a link you can use to unsubscribe.

- **Establish contact**

If you complete a contact form on the website, or send us an email, the data you send us will be retained as long as this is necessary to fully respond to and deal with the contact form or email in line with the nature of the form or the contents of the email.

- **Analytics**

As part of the way in which our website interacts with internet users, when users access TecLub's website, our website gathers data to improve website functionality and service requests. For this Google Analytics is used. Our gathered data is anonymous and therefore not connected to your personal data. Think of information like the time spent on the website or pages you often visit.

Use of cookies

A "cookie" refers to a portion of data that is placed and stored by one's browser on one's computer's hard drive. TecLub utilizes cookies to support website functionality and service requests, and to perform website analytics. TecLub's cookie statement is available at www.teclub.nl

Disclosure

TecLub may contract with other companies or individuals ("Third party service providers") to perform certain duties on our behalf. In so doing, it may be necessary that we provide them with access to personal data. Our third party service providers are required to maintain the confidentiality of the personal data, and are restricted from using the information for any other purpose than the purposes defined by TecLub. Your data will never be sold to other parties.

We take appropriate measures, by contract or otherwise, to provide adequate protection for personal data that is disclosed to our third party service providers, and to ensure that our third party service providers have sufficient legal, organizational and technical procedures in place to protect personal data in accordance with applicable data protection law. We also may provide personal data to government agencies and regulatory and legal authorities as required by law or regulation.

Security

We take security measures to limit the misuse of and unauthorized access to the personal data.

Data retention

TecLub retains personal data we collect for reasonable periods of time, in accordance with specific policies or as required by law. Personal data collected for a specified purpose will only be used for that purpose and, unless that information is otherwise required to be retained, after a reasonable period of time, the personal data will no longer be actively stored when that purpose has been fulfilled. If personal data is no longer required for the purpose they were collected and stored, they will be removed.

Policy changes

TecLub reserves the right to modify this privacy policy at any time. A current version of this privacy policy will always be available on TecLub's website at www.teclub.nl.

Inspection and modification of your data

You may contact us at any time if there are any questions concerning our privacy policy or concerning inspection and modifications (or deletion) of your personal data.

Contact information

For any questions or comments about this privacy policy or TecLub's privacy practices, please contact us using the contact details below. We will respond to this as soon as possible, but in any case within one month.

Technical Lubricants International B.V.

Molenwerf 56, 1911 DB,
Uitgeest, The Netherlands.
Tel: +31 (0)251 228 957
E-mail: info@teclub.nl
KvK number: 34065024