

METAGENICS BELGIUM BVBA

PRIVACY POLICY (VERSION 16/05/2018)

1 Who are we?

This is the Privacy Policy of Metagenics Belgium BVBA, with registered office at Edward Vlietinckstraat 20, 8400 Oostende, and registered in the Crossroads Bank of Enterprises under the company number BE 0881.352.886.

In the context of our activities (the production and sale of food supplements via a network of distributors and other sales channels, as well as the follow-up and the provision of aftersales services) we collect, hold, disclose and/or otherwise process personal data. Pursuant to the applicable data protection and privacy legislation, we qualify as the controller with respect to the personal data that we process.

2 What is the importance of this Privacy Policy?

We value your right to privacy and strive to protect your personal data in accordance with applicable data protection legislation and more specifically with the General Data Protection Regulation ("GDPR") and its national implementing legislation.

In this Privacy Policy we set forth how we collect your personal data, how and for which purposes we may use your personal data and to whom your personal data may be disclosed by us.

Further, this Privacy Policy includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this Privacy Policy carefully.

From time to time, we may need to change this Privacy Policy. In such a case, we will send you a copy of this new version per e-mail. The most recent version of this Privacy Policy is available on our website(s): www.metagenics.eu.

Attention: By sharing your personal data with us, we expect that you read this Privacy Policy carefully.

Note: This does not mean that we need your 'consent' to the processing of your personal data. We do not process your personal data on the basis of your consent, unless specifically indicated (e.g. for sending of our electronic newsletter).

3 Whose personal data do we collect?

In the context of our services (as described above), we may process personal data of contact persons at our suppliers, distributors, clients or other commercial partners, of doctors or other professionals, of visitors or participants to a congress or another event (including speakers), of consumers who buy or use our products, and of visitors of our website(s).

4 How do we collect personal data relating to you?

We may collect information about you in various ways:

- directly from you when you provide us with your personal data (as a visitor, participant or

speaker) during a congress, meeting or another event organised by us or by a third party;

- directly from you in the context of contractual negotiations or the conclusion of an agreement (eg. a purchase from our webshop);
- directly from you when you register on our website(s), when you navigate our website(s), when you complete a contact form on our website(s) or when you register for our electronic newsletter;
- directly from you when you participate in a contest organised by us;
- directly from you (e.g. doctors) during a visit or another contact moment by one of our sellers/representatives;
- via our distributors or professional clients, when you provide your personal data to them in the context of a purchase or a request for information; or
- via third parties and official sources.

5 What personal data do we collect?

We may collect the following personal data about you:

Identification and contact information	Personal identification data: name, address, telephone number, mobile number, email address
	Electronic identification data: IP addresses, information collected via cookies (read our Cookies Policy)
Financial information	Identification data and bank account numbers
	Financial transactions: amounts that you have to pay and have paid, overview of the payments, etc.
Personal characteristics	Personal characteristics: sex, birth date, nationality, language preference
Lifestyle	Characteristics with respect to the consumption of our products (with the exception of (sensitive) health data)
Profession and employment	Profession and employment (individual or company, where appropriate VAT number)
Health data	Bariatric surgery underwent (voluntarily disclosed)
Other categories of data	Your purchase intentions and interests

Anytime certain information is mandatory and other information is optional, this shall be clearly indicated.

6 For what purposes do we use your personal data?

We use this personal data for the following purposes:

- for supplier, customer and distributor management,
- for the management of our website(s),
- for the organisation of events,
- to provide you with the information requested by you, such as:
 - o to send you a leaflet or an information package,
 - o to contact you with respect to our product offering,
 - o to answer a question that you have asked,
- to keep you informed of possible prizes after participating in a contest,
- for production planning or follow-up of orders/deliveries,
- to comply with legal obligations (e.g. with respect to legal or commercial product warranties or product recalls),
- for contact purposes in the context of our aftersales services,
- for market research and customer satisfaction surveys (e.g. surveys or the compilation of statistics), or
- for marketing purposes, either for our paper mailings or for our electronic mailings (if you had subscribed to this) and for call-back campaigns (if you are not subscribed to the 'do not call' list ('bel-me-niet-meer' lijst)).

For your full information, you can find hereinafter the legal grounds used for these processing activities:

- for the processing of your personal data for the delivery of products and for the follow-up on sales and invoicing, or to provide you with certain information with respect to purchased products, we rely upon the necessity for the performance of a contract,
- for the processing of your personal data in the context of the follow-up on product warranties and product safety, we rely upon the necessity for compliance with our legal obligations as a producer,
- in all other cases, the processing of your personal data is based on the necessity for the purposes of the legitimate interests as a company (i.e. the interest of making contacts with prospects and possible clients),
- the processing of your personal data for conducting market researches and customer satisfaction surveys is based on the necessity for the purposes of the legitimate interests as a company (i.e. the interest of gaining information about buying behavior, preferences and

purchase intentions of clients in order to establish marketing strategies, and our interest to follow-up on customer satisfaction in order to improve our services),

- for the processing of your personal data for electronic direct marketing purposes (sending our electronic newsletter), we rely upon your opt-in consent. Only if you have unambiguously stated that you would like to receive our electronic newsletter (you are entirely free to do this), we will register you for this newsletter.
- We note that you have the right to withdraw that consent at any time, without us requesting any fee for this and without this having any negative implications for you. You may do so by contacting the Data protection responsible, Edward Vlietinckstraat 20, 8400 Oostende or **dataprotection@metagenics.eu**

7 With whom do we share your personal data?

- With our service providers ('processors'):

In the context of our activities as described above, we may share your personal data with third parties, in particular with service providers (such as IT/cloud service providers or PR/marketing service providers who organise mailing campaigns for us) that act as our 'processors'.

- Within our group of undertakings and with our network of distributors:

We may also share your personal data within our group of undertakings and with our distributors or commercial partners (so that they can contact you).

- With government authorities:

Further, we may share your personal data with the government, police authorities or the judiciary in case we have a legal obligation to do so.

We will implement appropriate safeguards when transferring your personal data to third parties. If necessary, we will for example conclude a processing agreement specifying the limitations to the use of your personal data and the obligations with respect to the security of your personal data.

Your personal data and your profile will not be lent or sold to third parties for marketing purposes without your prior explicit consent.

8 How long do we store your personal data?

Your personal data will not be stored for longer than is necessary in relation to the purposes for which we process them (as listed above). Afterwards it is still possible that they can be found in our back-ups or archives, but they will no longer be actively processed in a file.

More specifically, the following storage periods apply: For direct marketing purposes we keep the data as long as we plan to continue sending relevant information to the contacts on our mailing lists unless (i) we note that their (e-mail) address is out of use or (ii) we are notified that he/she wants to opt-out of receiving any further mailings. The data relating to the customer administration will be kept for 15 year.

Only where we are legally obliged to, or where this is necessary for defending our interests in the context of judicial proceedings (e.g. in case of a dispute), we will store the personal data for longer periods.

9 How do we protect your personal data?

We will implement the necessary administrative, technical and organisational measures for ensuring a level of security appropriate to the specific risks that we have identified.

We protect your personal data against destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

Further, we seek to ensure that we keep your personal data accurate and up to date. In view thereof, we kindly request you to inform us of any changes to your personal data (such as a change in your contact details).

More information on our protection measures is available upon simple request.

10 What are your rights and how can you exercise them?

You have (under certain conditions) the right to:

- information about and access to your personal data;
- rectify your personal data;
- erasure of your personal data ('right to be forgotten');
- restriction of processing of your personal data;
- object to the processing of your personal data;
- receive your personal data in a structured, commonly used and machine readable format and to (have) transmit(ted) your personal data to another organisation.

To read more about these rights, and circumstances under which you can use these rights, **in particular your right to object (this is your 'opt-out' right for our electronic newsletter and for call-back campaigns (by subscribing to the 'do not call' list))**, see the Annex to this document. In principle you may exercise these rights free of charge. Only where requests are manifestly unfounded or excessive we may charge a reasonable fee.

We aim to respond as quickly as possible to your requests or questions. We might request a proof of identity in advance in order to double-check your request.

Finally, you have the right to lodge a complaint with the Belgian Privacy Commission / Data Protection Authority relating to the processing of your personal data by us.

11 Contact

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your personal data by us, please feel free to contact us at by regular mail at the

attention of the Data protection Responsible at Edward Vlietinckstraat 20, 8400 Oostende or via dataprotection@metagenics.eu.

Annex – More information about your rights as a data subject

Right to information and right to access your personal data You may at any time request more information on our processing activities and the personal data that we are keeping from you.

Right to rectification of inaccurate or incomplete personal data of You have the right to require us to, without undue delay, rectify or complete any of your personal data that is inaccurate or incomplete.

Right to deletion of your personal data ('right to be forgotten') You may request us to delete (part of) your personal data in the following situations:

- when the processing is no longer necessary for achieving the purposes for which they we collected or otherwise processed these; or
- when the processing was based on your consent and you have decided to withdraw that consent;
- when you have other reasonable grounds to object to the processing of your personal data;
- when we would unlawfully process your personal data;
- when your personal data have to be erased in compliance with a legal obligation directed to us.

We note that in some case, we may refuse to delete your personal data: (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation; or (iii) for the establishment, exercise or defence of legal claims.

Right to restriction of processing You may request us to (temporarily) restrict the processing of your personal data in the following situations:

- when you have contested the accuracy of your personal data, for a period enabling us to verify this accuracy; or
- when the processing appears to be unlawful and you request us the restriction of use of your data instead of the deletion of this data; or
- when we no longer need the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; or
- pending verification whether our legitimate grounds override yours in the framework of an objection.

Right to object to the processing of your personal data (free of charge) You may under certain circumstances object to the processing of your personal data, when such processing is based on our “legitimate interests”. If we agree, we will no longer process your personal data, unless we have compelling legitimate grounds to do so, or because such a processing is necessary.

Where we process your personal data for *direct marketing* purposes (***in particular for sending our electronic newsletter or personalised advertisement via regular mail***), you may **at any time object to the processing thereof** or withdraw your consent thereto. You also have the right not to be subject to *profiling* for direct marketing purposes.

Right to data portability In some cases, you have the right to receive all your personal data in a

structured, commonly used and machine-readable format and have the right to transmit those data to another controller. This right applies:

- in case the processing is based on consent or on the necessity for the performance of a contract; and
- in case the processing is carried out by automated means.

1 What is the purpose of this policy?

Metagenics Belgium BVBA is a company incorporated under Belgian law, with registered office at Edward Vlietinckstraat 20, 8400 Oostende, and registered in the Crossroads Bank of Enterprises under the company number BE 0881.352.886.

This is the policy of Metagenics Belgium BVBA with respect to the use of cookies on our general website www.metagenics.eu and our product websites such as www.metasleep.eu, www.metarelay.eu, www.metarelay.nl, www.curcudyn.eu, www.probactiol.eu, www.similase.eu, www.barinutrics.eu, www.probactiol.ch, www.metagenicsacademy.eu (hereinafter referred to as our “Websites”).

This Cookies Policy serves to inform you thereof, so that you can easily manage your cookie-settings. This Policy should be read together with our Privacy Policy, which can be found on www.metagenics.eu.

2 What are cookies and why are they used?

Cookies are small pieces of data that are stored on your computer or mobile device via your browser. The Belgian Act on Electronic Communications (transposition of the European e-Privacy Directive) applies to it.

Some of the cookies that we use on our Websites are essential to make our Websites work, others serve to provide you a better, faster and safer user experience.

Cookies are often classified in the following categories:

- ❖ “session cookies”: cookies that are automatically erased once the user exits the web browser window;
- ❖ “persistent cookies”: cookies that are placed on a user’s hard drive and stay there for a certain period of time (cookies can expire after several minutes, days or years);
- ❖ “own cookies”: cookies that are developed and placed by the website operator itself; and
- ❖ “cookies from third parties”: cookies that are placed by a website that belongs to a domain different from the one shown in the address bar of the website.

You will find more information on the specific cookies that we use on our Websites in point 4 below. Under point 5 you will learn how to manage these cookies and, if desired, how to delete them.

3 Which cookies do we use?

Hereinafter you can find a list of the cookies that we are using on our Websites.

<i>Type of cookie</i>	<i>Purpose of the cookie</i>	<i>Name of the cookie</i>	<i>Own cookie / third party cookie</i>	<i>Storage period</i>
Necessary technical cookies	This cookie is indispensable for the functioning of our Websites and allows you to use certain parts of it. For instance, it allows you to navigate between the different parts of the Websites to fill in forms, etc. If you refuse these cookies, certain parts of the Websites will not work, or will not work optimally.			
Analytical cookies	This cookie allows us to recognize the visitors of our Websites, to count the number of visitors and to identify the way in which they navigate. This allows us to improve the user navigation and to ensure that visitors can faster and easier find what they need. In particular we are using Google Analytics on our Websites	__utma	Third party	Permanent
		__utmb	Third party	Permanent
		__utmc	Third party	Session
		__utmz	Third party	Permanent
		_gaa	Third party	Permanent
		_gid	Third party	Permanent
Performance cookies	These cookies obtain information about visitor's use of our Websites. They help us understand how visitors interact with our Websites, why certain error messages appear and enable us to try out new functions. We use this information to improve the user experience of our Websites.	__utmt_UA-67465697-1	Third party	Permanent
		Google Universal Analytics	Third party	Session
Functional cookies	These cookies make it easier for our Websites to work, makes it more pleasant for visitors, and ensures that you have a more personalized browsing experience. For example, these cookies can remember your language preferences, whether or not you are using our Websites for the first	cdcpLayout	Own cookie	Session
		cdcploggedin	Own cookie	Session
		cdcpnav0hidden	Own cookie	Session
		cdcpnav2hidden	Own cookie	Session
		cdcpnav4hidden	Own cookie	Session

	time, if you have accepted our cookie banner, etc.	homepage_country	Own cookie	Permanent
		homepage_lang	Own cookie	Permanent
		MetagenicsLoginPref	Own cookie	Permanent
		session-id	Own cookie	Session
		Has_js	Own cookie	Session
		Local storage	Own cookie	Session
		Drupal Check – Javascript enabled	Third party	Session
Targeting / advertisement cookies	Our Websites use targeting cookies in order to track statistics of visitors and to send you personalised messages, advertisements and promotions.	Double Click	Third party	Permanent

4 How can you manage / delete these cookies?

All major internet browsers offer the option to manage the cookies that were installed on your computer or mobile device.

In case you do not want that these Websites place cookies on your computer or mobile device, you may limit or delete this easily by adjusting your browser or mobile settings. In addition, you can set you browser or mobile settings in such a way that you get a notification every time you receive a cookie on your computer or mobile device, so that you can decide whether you wish to accept this cookie or not.

Please note that when you disable certain cookies of which we are making use, the possibility exists that certain parts of our Websites will no longer function properly and you will no longer enjoy an optimal user experience.

Google Chrome

- Click the wrench icon on the browser toolbar
- Select Settings
- Click 'Show advanced settings'
- In the "Privacy" section, click the 'Content settings' button
- To enable cookies in the "Cookies" section, pick 'Allow local data to be set', this will enable both first-party and third-party cookies. To allow only first-party cookies pick 'Block all third-party cookies without exception'
- To disable cookies, in the "Cookies" section, pick 'Block sites from setting any data'

Note there are various levels of cookie enablement and disablement in Chrome. For more information on other cookie settings offered in Chrome, refer to the following page from Google: <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

Microsoft Internet Explorer 6.0, 7.0, 8.0

- Click on 'Tools' at the top of your browser window and select 'Internet Options'
- In the options window navigate to the 'Privacy' tab
- To enable cookies: Set the slider to 'Medium' or below
- To disable cookies: Move the slider to the top to block all cookies

Note there are various levels of cookie enablement and disablement in Explorer. For more information on other cookie settings offered in Internet Explorer, refer to the following page from Microsoft: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>

Mozilla Firefox

- Click on 'Tools' at the browser menu and select 'Options'
- Select the Privacy panel
- To enable cookies: Check 'Accept cookies for sites'
- To disable cookies: Uncheck 'Accept cookies for sites'

Note there are various levels of cookie enablement and disablement in Firefox. For more information, refer to the following page from Mozilla: <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>

Opera

- Click on 'Setting' at the browser menu and select 'Settings'
- Select 'Quick Preferences'
- To enable cookies: check "Enable Cookies"
- To disable cookies: uncheck "Enable Cookies"

Note there are various levels of cookie enablement and disablement in Opera. For more information on other cookie settings offered in Opera, refer to the following page from Opera Software: <http://www.opera.com/browser/tutorials/security/privacy/>

Safari on OSX

- Click on 'Safari' at the menu bar and select the 'Preferences' option
- Click on 'Security'
- To enable cookies: In the 'Accept cookies' section select 'Only from site you navigate to'
- To disable cookies: In the 'Accept cookies' section select 'Never'

Note there are various levels of cookie enablement and disablement in Safari. For more information on other cookie settings offered in Safari, refer to the following page from Apple: <http://docs.info.apple.com/article.html?path=Safari/3.0/en/9277.html>

All other browsers

Please look for a "help" function in the browser or contact the browser provider.

5 Changes to this Cookies Policy

From time to time, we may need to change this Cookies Policy, for example in case of use of new functionalities on our Websites. We therefore encourage you to regularly review this Cookies Policy. Important amendments will be announced on our Websites. This version of the Cookies Policy was last modified on 14/05/2018.

6 Contact

If you have any questions, comments or complaints in relation to this Cookies Policy, please feel free to contact us by regular mail at the attention of the Data Protection Responsible at Edward Vlietinckstraat 20, 8400 Oostende, Belgium or via dataprotection@metagenics.eu.