

# PRIVACY POLICY BELLEROSE

## **ARTICLE 1 - GENERAL PRINCIPLES**

1.1 BELLEROSE SA is a Belgian company, headquartered in 1213 Chaussée de Waterloo 1180 Brussels (Belgium), registered with the Belgian register of companies under the number 0442.058.395 (herein after referred to as « **BELLEROSE** ») which operates an online selling platform through the Website [www.bellerose.be](http://www.bellerose.be) (hereinafter referred to as the “Website”).

1.2 All personal data collected by us (hereinafter referred to as “**Personal data**”) are processed in compliance with the European and Belgian regulations applicable to the protection of personal data in particular with the 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 (General Data Protection Regulation, “**GDPR**”), the Directive 2002/58/EC as amended by the Directive 2009/136/EC and the Belgian law of 13 June 2005 on “Electronic Communication” as amended by the law of 10 July 2012.

1.3 You are invited to read carefully this Privacy Policy (herein after referred to as the « **Policy** »).

## **ARTICLE 2: SCOPE**

2.1 This Policy explains how BELLEROSE uses and process your Personal data when you use the Website and your rights as user of the Website.

2.2. As used in this privacy policy, the term “Personal Data” means information that, alone or in combination with other information available to BELLEROSE, identifies you directly or indirectly, and has the same meaning as set out in the GDPR.

2.3. The Policy applies to all services provided by BELLEROSE via the Website.

## **ARTICLE 3: COLLECTED DATA**

3.1 When you visit the Website, we may collect information (Personal data included) in several ways:

3.1.1 Data provided by the users. We collect data that you provide by using the Website in order to allow us and our Partners to proceed and fulfil your orders.

3.1.2 Data collected via technological tools. When you use the Website, our computer systems may collect passive data such as the IP (Internet Protocol) address or the browser type. We also use cookies in order to recognize the preferences of our visitors so that we can configure our Website as user-friendly as possible and to make it possible for specific applications of our Website to operate correctly.

3.2. By using the Website or providing Personal Data, you are consenting to and authorizing the collection and procession of your Personal Data as described in this Policy. If you do not consent to or cannot authorize the collection and processing of your Personal Data as described in this Policy, do not use the Website.

3.3. You have the right to withdraw your agreement at any time, by contacting BELLEROSE to the following address:

Bellerose Belgium SA  
Customer Service Department  
Rijshout 3  
1702 Dilbeek, Belgique

OR

Via email: [shop@bellerose.be](mailto:shop@bellerose.be)

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### **ARTICLE 4: PURPOSE OF THE DATA PROCESSING**

4.1 The personal data that we collect are used to process the execution and follow-up of your bookings and the corresponding services. In addition, the personal data collected is used to improve our services and let us know your interests with regard to the functionalities, the performances and the support of our services.

4.2 We may use the Personal data collected ourselves or via several supports for the purposes of promotional, commercial or information communications. In this context, in order to ensure a better use of our services and to keep you informed about our news and our best offers, we may offer our newsletters for free. Unless you notify your objection, we are entitled to send you via e-mail information regarding the use of our services and our promotional offers.

4.3 In addition, we may use the Personal data collected to carry out studies aimed at improving our services.

4.4 We may disclose your Personal data if necessary in order to (a) comply with the applicable laws or satisfy a Court order or injunction; or to (b) protect and defend our rights and the rights of the Users of the Website or (c) to comply with other legal or regulatory requirements. BELLEROSE will use reasonable efforts to notify you before so doing, unless BELLEROSE is legally restricted from doing so.

4.5 We may disclose your Personal data to our direct e-mail marketing providers, in the event you choose to receive our promotional communications. In any case, we make reasonable efforts to the extent within our control to ensure that the concerned companies respect this Policy. We prohibit the mentioned companies to use your Personal data for purposes other than to provide the products and/or services specifically requested by BELLEROSE.

4.6. We may also transfer your Personal Data to our management and billing software providers, i.e. Shopify Inc. and its affiliates, including Shopify Data Processing (USA) Inc., Shopify Payments (USA) Inc., Shopify (USA) Inc., and Shopify International Limited (hereinafter collectively referred to as “Shopify”) , in order to execute the service(s) provided on our Website.

4.7 We may anonymize your Personal data by removing the personally identifiable information such as the name and e-mail address and then aggregate data for market research purpose. We may further disclose such anonymized information to third parties.

4.8 Except as otherwise provided in the present section, we undertake not to transfer your Personal data to third parties without your approval.

### **ARTICLE 5: RIGHT TO OPPOSE**

5.1 You have the right to oppose to the processing of your Personal data and to the use of said data for the purposes of prospection, in particular of commercial nature. This right may be exercised by sending a letter to BELLEROSE :

Bellerose Belgium SA  
Customer Service Department  
Rijshout 3  
1703 Dilbeek, Belgique

OR

Via email: [shop@bellerose.be](mailto:shop@bellerose.be)

5.2 To unsubscribe from our newsletters you may click on the “unsubscribe” link situated at the bottom of all our newsletters. The unsubscribe requests are taken into account only if you further receive a confirmation message. In the event you do not receive the confirmation message, you may exercise the right to oppose as described in article 6.1 of this Policy.

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### **ARTICLE 6: RIGHT TO ACCESS, TO RECTIFY, TO REMOVE AND TO LIMIT THE PROCESSING**

6.1 You have the right to access, to rectify, to remove and to limit the processing of your Personal data in accordance with Article 15, 16, 17 and 18 of GDPR.

6.2. These rights may be exercised by sending a letter to BELLEROSE :

Bellerose Belgium SA  
Customer Service Department  
Rijshout 3  
1704 Dilbeek, Belgique

OR

Via email: [shop@bellerose.be](mailto:shop@bellerose.be)

6.2 Before replying to a request, we may invite you to identify yourself.

### **ARTICLE 7: RIGHT TO PORTABILITY**

7.1. You also have the right to receive the Personal data that concern you and that you have provided to BELLEROSE in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract and is carried out by automated means.

### **ARTICLE 8 : COOKIES**

8.1 A cookie is a piece of data stored on your device from our browser containing information about you. The purpose of the cookies is to improve the use of the Website. Cookies may be used to personalize the application according to your preferences. Cookies also allow the analysis of the use of the application.

8.2 BELLEROSE informs you about the types of cookies used on the Website:

**Analytics cookies** (Google Analytics, Facebook)

**Cookies used as a "shopping cart"** on a merchant site allow to keep track of the items stored in your order basket);

**Session cookies** are used to facilitate your use of the Website by storing certain data about you (delivery data, billing, preference for the language of the site or other preferences necessary to provide the requested service).

**Advertising cookies** designed to inform us about the products, services and pages that you consult, make it possible to personalize the advertisements that are likely to be offered to you on the Website by means of techniques called "retargeting" based on your previous research and your selection criteria (internal retargeting for the display of the start page, abandoned baskets and wishlists, and retargeting on sites external to BELLEROSE (Facebook, Google targeting, Big data, Google My business, etc.));

**Performance cookies** allow to know if a click on the Website led to a sale at one of our partners. The "tracing" of the purchase is crucial for the activation of the cash back and by means of this type of cookies, the Website succeeds in providing the service requested by the user. In accordance with the law of 13 June 2005 relating to electronic communications, these cookies do not collect any information allowing to personally identify the user and as they are set up strictly for their technical functionality they do not require the express consent of the user. subscriber.

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8.3 According to the law of 13 June 2005 relating to electronic communications, your consent is not necessary for the installation of cookies which have as sole purpose to facilitate the electronic communication or which are strictly necessary to the provision of online services at your express request (session cookies).

8.4 For other cookies, your consent or your refusal is provided via the settings of your browser or via the configuration of any other technical mean dealt via the application and allowing us to manage your navigation with the application.

8.5. You may refuse to install cookies following the procedures as described below in your browser options:

- If you use Internet Explorer, click [here](#):
- If you use Mozilla Firefox, click [here](#)
- If you use Google Chrome, click [here](#)
- If you use Safari, click [here](#)

8.6 We inform you that disabling cookies may be detrimental to the optimum navigation and to the functionalities of the Website.

8.7 You can always delete the accepted cookies. In the event you wish to delete cookies, the parameters and the preferences which are controlled by the concerned cookies will be also deleted.

### **ARTICLE 9: SECURITY MEASURES**

BELLEROSE takes all precautions to ensure the security of your Data. In particular, we have set up a program for securing the information stored in our systems. In addition, our computer systems have data encryption and software protection.

Unfortunately, no electronic communication over the Internet can be guaranteed to be 100% secure.

### **ARTICLE 10: CONSERVATION OF YOUR DATA**

BELLEROSE may store your personal data for a duration that does not exceed what is necessary in order to achieve the finality for which these data are collected, in particular to in order to offer you new products and / or services. To that end, BELLEROSE will delete your Personal Data after the cancellation of your subscription.

### **ARTICLE 12: RIGHT TO LODGE A COMPLAINT**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your Data infringes the GDPR

For Belgium

The Belgian supervisory authority is :

Commission de la protection de la vie privée

Rue de la Presse, 35, 1000 Bruxelles

Phone : +32 (0)2 274 48 00

Fax : +32 (0)2 274 48 35

Email : [commission@privacycommission.be](mailto:commission@privacycommission.be)

## **PRIVACY POLICY BELLEROSE**

For the UK:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow

Cheshire, SK9 5AF

Email: [accessicoinformation@ico.org.uk](mailto:accessicoinformation@ico.org.uk)

Phone: +44 0303 123 1113