

ACSL PRIVACY STATEMENT

PREAMBLE

Protecting the individual's privacy on the Internet is crucial to ACSL. We want to process all personal data in a legal, correct and transparent way. With this Privacy Statement we want to demonstrate our firm commitment to the individual's right to privacy and data protection in the context of ACSL's services to customers, business partners and vendors. It outlines how we handle information that can be used to directly or indirectly identify an individual.

This Privacy Statement refers to:

ACSL cvba with registered address at Tabakvest 9, 2000 Antwerp, Belgium; VAT number BE 0466.029.273

and

ACSL Ltd., Suite 6 Watergardens 4, Gibraltar

Together referred to as "ACSL"

In case of any questions or concerns with regard to this Privacy Statement you are requested to contact your Company's administrative contact or ACSL at gdpr@acslworld.com

1. DEFINITIONS

"Products & Services"	means products manufactured by vendors and delivered by vendors or business partners and services provided by business partners;
"ACSL Platform"	means the e-procurement platform, facilitating the e-procurement of Products & Services, which is provided by ACSL to customers, business partners and vendors;
"e-procurement"	refers to buying Products & Services via an online channel, in this case the ACSL platform;
"Users"	refers to the individuals making use of the ACSL Platform and can be employees of customers, business partners or vendors;
"you" and "your"	refers to individual Users;
"Personal Data"	means any information that can be used to directly or indirectly identify an individual;
"Company"	refers to the business who is the account holder/ is using ACSL for e-procurement purposes and of which you are an employee.

2. GENERAL

ACSL acts as a broker in the multi-national e-procurement of Products & Services. As such ACSL offers its customers the ACSL Platform with custom webshops per customer; Parties involved in this multi-national e-procurement of Products & Services are granted access to the ACSL Platform by creating a User account on the ACSL Platform;

ACSL only collects the Personal Data of Users who, prior to being granted access to the ACSL Platform, have read and accepted this Privacy Statement. Moreover ACSL only collects Personal Data of Users that are necessary to facilitate the multi-national e-procurement of Products & Services to the Users;

This Privacy Statement describes ACSL's practices in gathering, storing, processing and protecting Personal Data.

3. USE OF PERSONAL DATA

What Personal Data is involved

This Privacy Statement applies to Personal Data that Users provide to ACSL in the context of using the ACSL Platform.

These Personal Data may include:

- User information such as a person's name, business email address, business phone number
- Personal Data or contact information of other Users involved in the e-procurement process.

Data Subjects' Rights

Users have the right to access and modify their Personal Data. To exercise these rights, ACSL has procedures to allow updates to Personal Data. Each User can self-administer his/her own User account details on the ACSL Platform.

If you are unable to access and modify your Personal Data because you are no longer an employee of the Company or your account has been de-activated, you have to contact the administrative contact for the Company.

Anonymization or deletion of your Personal Data requires approval by your Company and/or ACSL because a lot of important information and history is linked to the User's account in respect of current or past e-procurement orders.

Requests to anonymize or delete Personal Data must be made to the administrative contact for your Company and such steps may require ACSL assistance.

Disclosure to Third Parties

ACSL does not provide your Personal Data to third parties, except to parties that are involved in the e-procurement contract you are party to as well, unless:

- you request or authorize it;
- such disclosure is necessary to process transactions or provide services which you have requested
- ACSL is compelled to do so by law

4. WHERE ACSL USES PERSONAL DATA

Providing the ACSL Platform to Users

ACSL will use Personal Data for the following limited purposes in relation to the ACSL Platform, to:

- facilitate operation of the ACSL Platform and its related services;
- perform internal tracking and improvement of the ACSL Platform;
- enable ACSL or the parties involved in the e-procurement process to contact you;
- process requested transactions through the ACSL Platform
- facilitate and enable reporting on the use of the ACSL Platform

As a general principle, your provision of Personal Data to the ACSL Platform is required to enable the Company to fulfill his role in the e-procurement process.

The data is generally only related to your role at your Company, and is not related to you as a private person or as an individual consumer.

The use of Personal Data is limited to facilitate the management of your contract with ACSL, providing the ACSL services to you/ your Company and providing support to the Users.

ACSL will treat Personal Data as confidential and will process Personal Data according to the lawful and technically feasible instructions of the User.

Tracking Technologies including Cookies

ACSL gathers certain information about your use of the ACSL Platform automatically and stores it in log files in order to optimize the functioning of the ACSL Platform, improve the User experience, enable ACSL to provide adequate User support and to constantly improve and further develop our Products & Services.

This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. The ACSL Platform utilizes cookies, User storage or similar technology. If you configure your browser to reject cookies you will not be able to access the ACSL Platform. Personal Data you submit while using the ACSL Platform is not stored in cookies except where necessary to perform website security, service functionality and usage analytics. ACSL does not place any third-party advertising tracking cookies on your computer during your use of the ACSL Platform. The webpages you access when using the ACSL platform do not respond to "do not track" signals sent by your browser. In relation to emails generated by the ACSL Platform, we may track the open-rate, click-through rate and/or bounce rate of the messages at the individual level.

5. DURATION OF STORAGE OF PERSONAL DATA

Your User account details will remain stored on the ACSL Platform.

Users are provided with user administration features with which they can access and modify elements of User's Personal Data. You can request ACSL to view, modify or correct your Personal Data on the ACSL Platform and have the right to object against direct marketing.

In case the Company has terminated to use the ACSL Platform, or you have ceased to be an employee of the Company, Personal Data stored by ACSL on the ACSL Platform can be anonymized at your request to the administrative contact for your Company. This will be done with some time delay to confirm anonymization and allow for log files to be overwritten, unless there is a legal obligation for ACSL to retain the information, retention is required for some time necessary to resolve a dispute, for billing purposes or an alternate approach has been mutually agreed with the Company.

6. WHERE ACSL STORES DATA

All data of the ACSL Platform are stored in the cloud. ACSL currently uses Amazon cloud services, located in USA Eastern Region.

7. HOW ACSL PROTECTS DATA

ACSL maintains appropriate technical and organizational security measures designed to ensure the security of Personal Data and to protect such Personal Data from loss, misuse, unauthorized access, disclosure, alteration or destruction.

8. COMPLAINTS

In case you are of the opinion that the processing of your Personal Data by ACSL is in breach with the applicable legislation in respect of data protection, you are entitled to lodge a complaint with ACSL or the competent data protection authorities. You can find the contact persons of the data protection authorities of the European union at:

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

9. CHANGES TO THE PRIVACY STATEMENT

ACSL will need to make changes to this Privacy Statement from time to time. In case ACSL has made changes to this Privacy Statement, the date of the Privacy Statement, shown in the footnote, will be updated accordingly.