

DATA PRIVACY POLICY

We, Menken Orlando B.V., are concerned with the privacy of our website's users. We believe that the online environment calls for a diligent and careful handling of consumers' personal information. This means: We undertake to process your data on the basis of this data privacy policy with the greatest diligence, greatest sense of responsibility and adherence to the relevant data privacy regulations at all times.

In the following, we would like to provide you with a short overview of how we handle personal information. The following information concerns only the website under www.mitsubasnacks.com and the subpages of this website (hereafter: Mitsuba website).

INFORMATION FOR PARENTS AND LEGAL GUARDIANS

In the scope of our online activities, we place special emphasis on informing children and youth under 18 years that they need permission from their parents before providing personal information.

If we find out that such data was sent to us without the consent of parents or other legal guardians, we will immediately delete it. Here, we rely on you as parents or legal guardians to provide the corresponding information to us.

In this context, we urge parents and legal guardians to monitor their children's online use and to speak to their children about safe and responsible use of their personal data online.

1. CONTROLLER

The controller for the processing of personal data is:

Menken Orlando B.V.

Kerketuinenweg 35

2544 CV Den Haag

Telephone: +31 (0)70 - 3082222

E-mail: info@mitsubasnacks.com

<https://mitsubasnacks.com>

2. PERSONAL DATA

Personal data is all information that you provide on our websites and which allows for you to be identified (e.g. your name, your email address, IP address).

We process this data in accordance with legal regulations for the purposes defined below and in the described scope.

3. COLLECTION, PROCESSING AND USE OF USER DATA

3.1 PARTICIPATION IN PROMOTIONS OR RAFFLES

Some of the promotions and raffles that you can participate in on the Mitsuba website requires registration in order to participate. To participate in these promotions or raffles you will be asked to provide your full name and your email address, and possibly, other personal data. We process this data exclusively to the extent necessary for the purposes of fulfilling the obligations assumed in connection with the promotions and raffles. We do not use this data for other purposes without express separate consent. Details of the process and design of each promotion or raffle and the scope of the data to be processed for these purposes can be found in the terms and conditions of participation of each promotion and raffle (legal basis is Art. 6 (1) clause 1, lit. a GDPR).

3.2 NEWSLETTER

We use your data for promotional purposes only if you gave your express consent to promotional use. On the Mitsuba website, you have the option of signing up for the Mitsuba newsletter by way of a double opt-in process. We use the personal data provided in the separate newsletter registration or in the scope of registration to participate in raffles or promotions only for the specified promotional purposes, if you ticked the corresponding checkbox during registration. The newsletter registration is finalized only by clicking on the confirmation link in the e-mail sent to you immediately after registration. (The legal basis for this is Art. 6(1), clause 1, lit. a GDPR)

In the Mitsuba newsletter you will receive information about our products (such as new flavors) and about promotions and raffles that you can participate in on the Mitsuba website.

We will process the data you provide when signing up for the newsletter (e-mail address and, if applicable, name and title) only for the mentioned promotional purposes.

The following applies to all data processing for promotional purposes:

If you granted your consent to us for the use of your data for the aforementioned promotional purposes, you can always withdraw it without specifying the reasons by email to info@mitsubasnacks.com or by mail to Mitsuba, Kerketuinenweg 35, 2544 CV Den Haag, The Netherlands. In each newsletter e-mail we offer you the option (via an unsubscribe link) to object to the sending of further e-mails.

3.3 DISCLOSURE OF DATA

The data collected and processed in connection with paragraphs 3.1 and 3.2 will be used for the purposes of mailings in form of confirmation e-mails and information about product news by Tableaux, Jan Deckersstraat 29, 5591 HN Heeze, The Netherlands (for additional information about this service provider visit <https://www.tableaux.nl>). Data collected in this context is not disclosed to third parties beyond this. Menken Orlando B.V. and Tableaux will conclude a order data processing contract in accordance with Art. 28 of GDPR.

3.4 CONTACT FORM

There is a contact form on the Mitsuba website, which you can use to ask us questions, or send us your suggestions or wishes or even criticism. To use the contact form you have to enter your name and your email address, and the message you want to send us. The data will be successfully sent, and we will respond to your request. Data arising in this context will be deleted as soon as its storage is no longer necessary, but at the latest after 365 days, unless there are deviating legal retention rights and obligations.

4. DATA PROCESSING WHEN ACCESSING THE MITSUBA PAGE (USAGE DATA)

Furthermore, we also use your data to optimize our online offering and to make your visit to our website even more convenient, personalized, and secure.

4.1 LOG FILES

During website use merely for informational purposes, i.e. when you do not register or send us other information, only data in the log files is stored and processed, if necessary, which is sent by your browser automatically to the server hosting the content. If you visit our website, we collected the following data that is necessary for us technically in order to show our website and guarantee its stability and security (the legal basis for this is Art. 6 (1) clause 1, lit. f GDPR):

- IP address of the requesting computer
- Date and time of the request
- URL of the retrieved website
- Possibly, URL of the website via which the user landed to the retrieved website
- Name of the requested file
- Page for which the file was requested
- Access status of the web server (file transfer, file not found, command not executed, etc.)
- Browser type and version
- Operating system of the end device used
- The amount of data transferred

This data is not combined with other data sources that could have a connection to a person. In particular, we use the IP address to guarantee system security, because we can identify and block the user in this way, e.g. in case of a hacker attack. Moreover, the data is evaluated for statistical purposes. It is automatically deleted after four weeks.

The servers that host the Mitsuba website and store the personal data processed during your visit to our website are located in the Netherlands and operated by Tableaux as a hosting service provider.

4.2 USE OF COOKIES

Moreover, we use “cookies” on our websites. A cookie is a small data file transferred to your computer when you surf our website. A cookie can only contain information that we send to your computer ourselves and by means of which we receive certain information—personal data cannot be read in this way. This information includes, in particular, your browser type and version, the URL clickstream (i.e. the websites you visited on our online offering and in which order), the date and time of your visit to us, as well as the cookie number. If we use cookies and you accepted them, we have no access to your personal information, but we can identify your computer with the help of cookies. Using cookies, we cannot track your identity. Only anonymised information is generated. We only use session cookies: They do not stay on your computer. Once you leave our website, the temporary cookie is discarded. With the help of gathered information we can analyze usage patterns and structures of our website and optimize the website by improving our content and personalization, and simplifying use. We do not drop permanent cookies that remain after you leave our website. See section 4.3 on the use of such cookies in the framework of functional analysis of the website.

Most browsers (e.g. Firefox, Chrome, Internet Explorer, Safari, etc.) accept cookies as a standard. You allow or block temporary and stored cookies independently of each other in the browser settings.

However, please note that certain features of our websites will not be available to you and some websites may not be displayed correctly when you deactivate cookies.

4.3 WEB ANALYSIS WITH GOOGLE ANALYTICS

This website uses the analytics service Google Analytics by Google Inc. ("Google"). Google Analytics uses cookies, which are stored on your computer and enable an analysis of your website use. The information stored by the cookie is usually transmitted to a Google server in the USA and stored there. Your IP address is generally shortened before transfer by Google within member states of the European Union or in other Contracting States to the Agreement on the European Economic Area. On our behalf, Google uses this information to evaluate website use for us, prepare reports about website activities, and provide further services related to website usage and Internet usage. The anonymized IP address that your browser transmits within the scope of Google Analytics will not be combined by Google with any other data.

Please note that on this website Google Analytics includes the code "`_anonymizeIp()`" in order to guarantee an anonymized collection of IP addresses (known as IP masking). This way, connection to a person can be ruled out. Please note that your IP address in this case is collected first by Google and then shortened. This is done largely in the EU, but to some extent in the USA as well. For further information concerning data processing please see the company's privacy policy.

You can prevent the collection and processing of your data by Google Analytics by either adjusting the cookie settings in your browser (see above) or downloading and installing the plug-in offered by Google under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

You can prevent collection by Google Analytics by clicking on the following link. An opt-out cookie will be dropped, which prevents the future collection of your data when visiting this website: Deactivate Google Analytics. Keep in mind that you have to renew this opt-out cookie if you delete this or all cookies in the browser settings.

We use Google Analytics to be able to analyse the use of our website and make regular improvements. With the aid of the statistics we obtain, we can improve our offering and make it more interesting for you. For the exceptional cases when personal data is transferred to the USA, Google has joined the EU/US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The basis for use of Google Analytics is Art. 6 (1), lit. f GDPR.

Third party provider's information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland; information about the terms of use and privacy policy of Google itself can be found under <http://www.google.com/analytics/terms/de.html> (Terms of Use Google Analytics) and under <https://www.google.com/intl/de/analytics/learn/privacy.html> (Privacy Policy Google Analytics) and <https://www.google.de/intl/de/policies/> (Privacy Policy Google).

4.4 USE OF SOCIAL MEDIA PLUG-INS AND OUR SOCIAL MEDIA PRESENCE

We are currently active on the following social media and use the following social media plug-ins: Facebook and Instagram. You will identify the plug-in provider by their initial letters or the logo on the corresponding button. We give you the option of communicating directly with the plug-in provider using the button. We use the two-click solution. That means, when you visit our website, no personal data is generally transferred to the plug-in provider at first. Only if you click in the marked field and activated it will the plug-in provider receive information that you visited the corresponding page of our website. By activating the plug-in, your personal data will be sent to the respective plug-in provider and saved there (in the USA, in the case of US providers).

For our Facebook page, Facebook provides us with information about how visitors use our page (this is called "Page Insights"). We and Facebook Ireland Limited ("Facebook") are jointly responsible for processing this Page Insights data and have reached a corresponding agreement (according to Art. 26 GDPR). The main content of this agreement that is of relevance to you is: In the framework of the GDPR, Facebook assumes the main responsibility for the processing of Insights data and adhering to all applicable GDPR obligations with respect to the processing of Insights data (including, but not limited to the fulfilment of the rights of data subjects). In the end of this section you will find out where you can get additional information about data processing by Facebook.

Apart from that, we have neither an influence on the collected data and data processing operations, nor do we know the full scope of data collection, the purpose of processing, or the retention periods. We also have no information about the deletion of the collected data by the plug-in provider.

The plug-in provider stores the data collected about you as user profiles and uses them for the purposes of advertising, market research and/or demand-driven design of its website. Such an evaluation is conducted (also for users that are not logged in) to display demand-driven advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, but to exercise this right you have to contact the respective plug-in provider.

With our social media presence and the plug-ins we offer you an even more attractive range of information about our products and the possibility of interacting with the social networks and other users, so that we can improve our offering and make it more interesting for you as a user. The legal basis for the use of user data and the plug-ins is Art. 6 (1), clause 1, lit. f GDPR.

The data is transferred regardless of whether or not you have an account with the plug-in provider and are logged in there. If you are logged in with the plug-in provider, your data collected by us will be directly allocated to your existing account with the plug-in provider. If you press the activated button and, e.g., link the page, the plug-in provider saves this information in your user account as well and shares it publicly with your contacts. We recommend that you regularly log out after using a social network, but particularly before activating the button, if you would like to prevent the allocation to your profile with the plug-in provider.

For more information about the purpose and scope of data collection and its processing by social media and plug-in providers, consult the privacy policies of this provider listed below. There, you will also find further information about your related rights and settings options to protect your privacy.

The addresses of the plug-in provider and URL to access the privacy policy:

- Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA;
<http://www.facebook.com/policy.php>; additional information about data collection:
<http://www.facebook.com/help/186325668085084> and
<http://www.facebook.com/about/privacy/your-info-on-other#applications>. Facebook is the EU/US Privacy Shield participant, <https://www.privacyshield.gov/EU-US-Framework>.

5. YOUR RIGHTS

You have the following rights with respect to your personal data:

- Right to information (Art. 15 (1) and (2) GDPR),
- Right to data rectification (Art. 16 (1) GDPR),
- Right to deletion (Art. 17 GDPR),
- Right to restriction of processing (Art. 18 GDPR),

- Right to object to processing (Art. 21 GDPR),
- Right to data portability (Art. 20 GDPR).

To exercise your rights, contact the place indicated in section 1.

You also have the right to lodge a complaint with a data protection supervisory authority regarding our processing of your personal data.

6. OBJECTION TO OR REVOCATION OF THE PROCESSING OF YOUR DATA

If you granted your consent to the processing of your personal data, you can always withdraw it without specifying the reasons by e-mail to [info\(at\)mitsubasnacks.com](mailto:info(at)mitsubasnacks.com) or by mail to Mitsuba, Kerketuinenweg 35, 2544 CV Den Haag, The Netherlands. The effects of the revocation are limited to storage and use of personal data that we do not process on other legal basis.

If we base the processing of your personal data on a balance of interests (Art. 6 (1), clause 1, lit. f GDPR), you may object to the processing. This is the case when we process your data without your prior consent for marketing purposes or when processing is not necessary in particular to fulfil a contract with you, which we have informed you about in the above description of the functions.

The right to object to data processing for marketing purposes can be exercised without providing any reasons.

In all other cases, please provide the reason why we are not supposed to process your data as done by us. In the event of your justified objection, we will immediately restrict further data processing, check the situation, and either stop or adapt the data processing or demonstrate our compelling legitimate interests for continued processing.

7. LINKS TO OTHER WEBSITES

If our website contains links to other websites, we expressly state that we have no control of the content of these websites or their handling of data, and we are not responsible for this. Therefore, we recommend that, when visiting another website, you make sure you understand its privacy policy and other guidelines.

If you find that our website contains a link to a site with content that can be considered at least questionable, in whichever regard, please let us know by getting in touch using our contact address provided in section 1.

Questions about data privacy?

If you have questions about our privacy policy, get in touch with us using the contact information provided in section 1.