

Privacy and cookie statement

This privacy and cookie statement was last updated on 3 June 2023.

Otrium B.V. (hereinafter: Otrium) offers a shop-in-shop outlet platform via the website www.otrium.com. With an influx of online orders from customers on a daily basis, we constantly process personal data.

Our privacy statement at a glance

We treat your personal data securely and carefully, this means that we:

- **Record our purposes** before we process your personal data, as set out in this privacy and cookie statement.
- **Store as little personal data as possible** and only the data necessary for our purposes.
- **Ask for explicit consent** for the processing of your personal data where explicit consent is required.
- **Take the necessary security measures** to protect your personal data. We also impose these obligations on third parties who process personal data on our behalf.
- **Respect your rights**, such as the right of access, rectification or erasure of your personal data processed by us.

For what purposes do we process your personal data?

When you use our platform, via browser and via our application, we obtain various personal data from you. In this privacy and cookie statement we specify for each purpose what data we obtain from you, for what purpose we process this data and for how long it is stored. If you have any questions or would like to know exactly what information we store, please contact us through the contact details provided at the bottom of this privacy and cookie statement.

Downloading our app

You can also use our platform via our app. In order to do so, you need to download our app first. You can do this via the App Store or via Google Play. We have no influence on which personal data is processed by the provider (Apple and Google) and for what purpose they use your information. We recommend that you read the relevant privacy statement of the provider in question. All the purposes set out below reflect upon the data processing by us when using our platform through your web browser or our app.

Creating an account

You can create an account on our website or application, after which you can place an order. You can also choose to log in using your [Facebook](#) or [Google](#) account. If you want to know how these parties process your personal data, please read the privacy statement of the platform in question. Creating your account is where we conclude an agreement to provide this account, the execution thereof is therefore naturally the legal basis for processing.

We process the following personal data for this purpose:

- Gender
- Name
- Email address
- Login credentials
- IP address

We store your personal information until you cancel your account or up to 2 years after you last logged in to your account. We then assume that you no longer wish to use our services. Some data is stored

longer if we are legally obligated to do so (e.g. because of a tax retention obligation, which can be 7 years).

Managing an account

Once you have created an account or logged in with your Facebook or Google account, you can decide which information you add to the account (for which execution of the agreement is also the legal basis of processing). You can include your personal information in your account. The account also includes an overview of your orders, as well as the option to indicate your preferences and save your favorite brands.

We process the following personal data for this purpose:

- Name
- Address details
- Contact details (email address and telephone number)
- Country
- Date of birth
- Gender
- Login credentials
- Personal (shopping) interests
- IP address

We store your personal information until you cancel your account or up to 2 years after you last logged in to your account. We then assume that you no longer wish to use our services. Some data is stored longer if we are legally obligated to do so (e.g. because of a tax retention obligation, which can be 7 years).

Contact

When you send us an email, use our contact form, contact us by telephone or in any other way, we will process the personal data necessary to support you, and to enable us to answer your query. The legal basis for this processing of personal data is the execution of the agreement with you.

We process the following personal data for this purpose:

- Name
- Email address
- Any information you provide as part of the content of a message

We store your data for as long as this contact requires it or up to a maximum of 2 years after we last had contact with you; we want to make sure we have dealt with your query or complaint properly.

Placing and handling orders

When you place an order via our platform, you enter certain information. This data is necessary for the purchase agreement between you and Otrium (execution of the agreement) and the underlying order to be carried out by us.

We process the following personal data for this purpose:

- Name
- Address details
- Contact details (email address and telephone number)
- Order confirmation
- Billing address
- Shipping address

- Payment details
- IP address

We store this information for up to 2 years after the purchase was made. Some data is stored longer if we are legally obligated to do so (e.g. because of a tax retention obligation, which can be 7 years).

Commercial messages

Otrium sends out commercial messages. This could be a digital newsletter, but also push notifications or text messages. The messages contain promotions, tips and information about our products and services.

You can subscribe to our commercial messages via the website and our app. For example, to remind you of items you've left in your shopping cart. These messages we send out with your consent or because you made a purchase via Otrium.

We could also send out such messages with regard to similar products and/or services to the ones we've already provided you with (i.e. clothing items, including shoes and accessories). The legal basis for such use of your personal data is our legitimate interest in providing the best services to you.

We process the following personal data for this purpose:

- Name
- Contact details (email address and telephone number)

Your personal data is stored until you unsubscribe from the commercial messages. You can unsubscribe from these messages at any time. There is an unsubscribe link in every newsletter, and you can also change the settings in your account in order to unsubscribe from receiving the commercial messages.

Third-party shop credit

You can share a personal link with your friends on our platform or a third party application, which allows your friends to share their email addresses with us. In exchange, both you and your friends will receive a discount code from us. We process the data on a legitimate interest basis, i.e. a commercial interest. In doing so, we have weighed the privacy interests of your friends. The email addresses of your friends are only used once to offer the shop credit. We then delete the data.

We process the following personal data for this purpose:

- Name
- E-mail addresses

We store their email addresses for as long as necessary to send the shop credit by email.

Reviews

You have the option to review our services via our webpage, which sends you through to the review platform. We use third parties to host these reviews, such as Kiyoh, Trustpilot, Facebook and Google. The reviews can be read on the websites of these parties. The parties themselves are responsible for data processing. If you want to know what they do with your personal data, please review the relevant privacy policies on their websites.

We have a commercial interest in improving our services which we can do based on the input from reviews. Therefore, we process your personal data based on such legitimate interest. Our commercial interest takes precedence over your privacy interest, given that you have control over what (personal) information you leave behind in the customer review.

We process the following personal data for this purpose:

- Name as stated in the customer review
- Place of residence
- Message content

We store your personal data for a maximum of 2 years after the review was posted.

Job applications

If you apply for one of our job openings or submit an open application, we process your personal data for the purpose of handling your application and in preparation for a possible employment contract.

We process the following personal data for this purpose:

- Name
- Address details
- Contact details (email address and telephone number)
- Curriculum Vitae
- Cover letter
- Salary requirements
- References
- Any other information you provide in your application

Your application details are stored for a maximum of 4 weeks after the position has been filled. We store this information so that we can contact you should the position become vacant again within the probationary period. If we are unable to offer you a position at this time, we may – with your consent – keep the application data for 1 more year. You can revoke your consent at any time by sending us an email. We will store your application data in your personnel file should you decide to work for us. This file will be stored for as long as necessary, and the application data will be kept for a maximum of 1 year after entering into employment.

Social media and internet screening can be part of the application procedure. This is necessary for us to preserve our image when hiring new staff, which is why we have a legitimate interest to process this personal data. We will do a search of your name on Google and any profile you may have on various social media. This applies, of course, insofar as these profiles are public. We will not ask you to grant us access to a private social media page or to accept a request from us. The results of the screening will be discussed with you where appropriate. Should you have any objections to this, you can inform us by email at the time of your application.

For the application process we work with a third party. They provide us with an applicant tracking system, to keep track of your application. When you apply for a position through this third party platform, we will always draw your attention to the fact that we work with this third party.

Otrium Partner Platform

If you are working at one of the companies that Otrium has a partnership with, we might process your personal data in order for you to have access to the Otrium Partner Platform. On the Otrium Partner Platform we provide insights into the relevant metrics with respect to the sales of products through our platform.

Your employer might request us to provide an email address for you to gain access to the Otrium Partner Platform. In this case your employer is the controller of the personal data we process from you.

They are in charge of the why and the how of the processing of your personal data and are also in charge of making and deleting your user profile.

Nevertheless, we would like you to know that we process the following personal data in the Otrium Partner Platform:

- First name
- Role in the company
- Credentials for log-in
- Metadata about the usage of the platform

After your employer deleted your account, we will not retain any personal data about you anymore. In order to ensure safe log-in and to avoid unauthorized access to the Otrium Partner Platform, we work with a third party who specializes in identity and access management.

When can we share your personal data with third parties?

Otrium will only share your information with third parties to the extent permitted by current legislation.

We may disclose your personal data to third parties in the following situations:

- we have contracted them to process certain data
- it is necessary to fulfil the contract with you
- you consent to it
- we have a legitimate interest in doing so
- we are legally obligated to do so (e.g., if the police demand it in case of a suspicion of a crime)

Third parties processing personal data on our behalf or yours:

- mail-order companies
- distribution centre
- payment service providers
- cookie service providers
- IT suppliers and service providers (a.o. software for processing applications and identity and access management)
- marketing companies
- review companies

Otrium may disclose your personal data to parties located outside the European Economic Area (EEA) to provide those services. Otrium will only do so if there is an appropriate level of protection for the processing of personal data. If there is no adequacy decision from the European Commission for that specific third country, Otrium will conclude the Standard Contractual Clauses (“SCCs”) with said third party.

Securing your personal data

Otrium takes appropriate technical and organisational measures for the processing of personal data to prevent loss or any form of unlawful processing (e.g., unauthorised access, tampering, modification, or disclosure of personal data).

Creating profiles

We compile and combine your personal data from various sources. This is done to provide you with the best online shopping experience. We do this by linking various data about you, such as your account details, order history, your preferences and favorite brands, but also your browsing behavior on our or external websites.

By combining your data, we can publish personalised promotions and content on the website or social media channels that match your interests and purchase history. It also allows us to personalise our newsletter for you. This will help us improve our targeted promotions, both on our website and through external advertisements.

We only create profiles with your consent. We use cookies on the website to collect and combine your data. Cookies allow us to see, for example, which pages on our website you have visited, which advertisements on external websites have been shown to you and whether you have viewed them or not, whether you are interested in discounts, and which items you have clicked on. The cookie overview lists the cookies we use.

Social media buttons

We use social media buttons on our website that redirect you to the relevant social media platforms. This gives you the option to follow us and share content. You will also see advertisements on your social media page. The buttons operate through bits of code provided by the social media networks. If you want to know what the social media platforms do with your personal data, please read the relevant privacy statements of [Facebook](#) or [Instagram](#).

These social media companies are located in the United States. Facebook and Instagram adhere to the Standard Contractual Clauses. For more information check out [Facebook's page on the SCCs](#) and [Instagram's page on the SCCs](#).

Cookies

Our website uses first-party and third-party cookies. Cookies are small data files that can be automatically stored on or read from the visitor's device (such as PC, tablet or smartphone) when visiting a website. This is done via the web browser on the device.

These cookies collect the following data from you:

- IP address
- Cookie ID
- Website and click behaviour
- Referrer URL

On your first visit to our website, we will display a message explaining how cookies are used. We will ask for your consent for the use of cookies to the extent we are required to do so.

Want to know more? The list of the cookies we use can be found in the overview below.

Cookie; Entity; safeguards	Type	Purpose	Retention period
Google Tag Manager Google LLC, United States Privacy statement	Functional	Google Tag Manager cookies enable scripts from other cookies to be loaded. Google Tag Manager is purely functional and is not used for the collection of personal data.	Session

<p>Google Analytics Google LLC, United States Privacy statement</p>	<p>Analytical</p>	<p>These cookies are placed to gain insight into visitor behavior and to improve the user experience. We have configured these cookies to be privacy-friendly. That means the following:</p> <ul style="list-style-type: none"> • We have concluded a data processing agreement with Google; • We only provide Google with masked IP addresses; • We do not share data with Google; and • We do not use other Google services in combination with analytics. 	<p>Maximum of 2 years</p>
<p>GA Audiences Google LLC, United States Privacy statement</p>	<p>Marketing</p>	<p>The GA Audiences cookies are used to get website visitors to return based on their online website behavior. This means that click behavior (among other things) is recorded for the purpose of measuring effectiveness and to show website visitors personalised content.</p>	<p>Maximum of 6 months</p>
<p>Google DoubleClick and DoubleClick Ad Exchange Google LLC, United States Privacy statement</p>	<p>Marketing</p>	<p>These cookies are used to register the website visitor’s actions on the website after viewing or clicking on advertisements. The purpose of this is to measure the effectiveness and to show personalised advertisements.</p>	<p>Maximum of 6 months</p>
<p>Google Dynamic Remarketing Google LLC, United States Privacy statement</p>	<p>Marketing</p>	<p>These cookies are placed so we can show relevant advertisements to people who have previously visited our website. They record click behavior and website visits.</p>	<p>Maximum of 1 year</p>
<p>Facebook Connect Facebook, United States Privacy statement</p>	<p>Social Media</p>	<p>These cookies are used to enable Facebook advert options. They record click behavior and website visits. These cookies record a unique ID to recognise recurring devices. The aim is to advertise in a targeted and personalised way.</p>	<p>Maximum of 3 months</p>
<p>Facebook Custom Audience Facebook, United States Privacy statement</p>	<p>Marketing</p>	<p>These cookies are used to enable Facebook advert options. They record click behavior and website visits. These cookies record a unique ID to recognise recurring devices. The aim is to advertise in a targeted and personalised way.</p>	<p>Maximum of 3 months</p>

Facebook Pixel Facebook, United States Privacy statement	Marketing	These cookies are used to enable the Facebook advertising option. They collect click behavior and website visits. These cookies collect a unique ID to recognize returning devices. The purpose of this is to be able to advertise in a personalized and targeted way.	Maximum of 2 years
Cloudflare Cloudflare, United States Privacy statement	Functional	Cloudflare is a content delivery network that identifies familiar web traffic.	Maximum of 1 year
Pingdom SolarWinds Worldwide LLC, United States Privacy statement	Analytical	Pingdom is a technological service that helps Otrium to improve and understand the experience of users, e.g., if the website is to be approached globally, does it work as it is supposed to, what is the upload speed and so on. The aim is to improve the website with the feedback of users. Pingdom uses cookies and other technologies to collect data of the behavior of the users and their devices.	Permanent
Pinterest Conversion Tracker Pinterest, Inc., United States Privacy statement	Analytical	Pinterest is a social media website and app that places cookies on our website to gain more insight into the way visitors use our website (what is searched for, how often an account is created, which pages are visited and how often, etc.). This enables us to improve our website with feedback from users. Pinterest uses cookies and other technologies to collect data about the behavior of our users and their devices (browser information, IP addresses, hardware/software type, etc.).	Maximum of 6 months
Pinterest Pinterest, Inc., United States Privacy statement	Social Media	These cookies are used to display photos on Pinterest of the products we offer.	Maximum of 3 months
Criteo Criteo S.A., France Privacy statement	Marketing	Criteo is a retargeting platform that allows to retarget users with relevant advertisements based on their website behavior.	Maximum of 13 months

Segment Segment.io, Inc., United States Privacy statement	Analytical	Segment.io, Inc. offers application programming interface solutions. The Company collects, clean, and control customer data with segment, as well as provides data integration, governance, and audience management services.	Expires after 7 days of user inactivity
Hotjar Hotjar Ltd., Malta Privacy statement	Analytical	Hotjar collects qualitative data which provides insights into user behavior on a website. These cookies are responsible for displaying the correct content to Otrium’s visitors. In this way, we track how users are engaging with our platform.	Maximum of 1 year
New Relic New Relic, United States Privacy statement	Analytical	New Relic provides cookies that enable Otrium to monitor the use of our website.	Session
Fit Analytics Fit Analytics GmbH, Germany Privacy statement	Marketing	FitAnalytics cookies ensure that we personalize our offering of products with the right size to our customers. Furthermore, by using the cookies they resolve sizing for shoppers by explaining different sizing measures per country.	Maximum of 4 weeks
TrustPilot TrustPilot A/S, Denmark Privacy statement	Functional	These cookies allow the display of TrustPilot score per country.	Maximum of 1 year
WooCommerce, WooCommerce, United States Privacy statement	Functional	These cookies are used to monitor and store data about the adjustments of the shopping cart of the visitor.	Session
UserMatchHistory LinkedIn, United States Privacy statement	Marketing	LinkedIn sets this cookie to provide advertisements and retargeting on LinkedIn.	Maximum of 30 days
Lidc LinkedIn, United States Privacy statement	Marketing	LinkedIn sets the lidc cookie to store performed actions on the website and to facilitate data center selection.	Maximum of 24 hours

Lang LinkedIn, United States Privacy statement	Functional	LinkedIn sets this cookie to show the language that a user has selected in their settings.	Session
Bcookie LinkedIn, United States Privacy statement	Functional	LinkedIn sets this cookie with browser-ID with which devices for access are uniquely identified in order to detect misuse on the platform.	Maximum of 2 years
Salesfeed SalesFeed Nederland B.V., Netherlands Privacy statement	Marketing	These cookies make it possible to adapt the content of our website to the website visitor on the basis of certain data, which are made known to us by means of these cookies. This could be information about the number of times you visit our website, and which pages you visited.	Session
Partnerize Partnerize, United Kingdom Privacy statement	Marketing	Partnerize is an affiliate partner, and this concerns first party cookies. These are used to recognize the origin of a customer proceeding with a transaction in order to provide fees.	Maximum of 30 days
Token_v2 and several others Reddit, United States Privacy statement	Marketing	The use of these Reddit cookies is to enable to track if the visitor comes from the Reddit webpage and which actions are taken after being redirected. Also, they might retain the credentials.	Maximum of 30 days
Reddit Pixel.js Reddit, United States Privacy statement	Marketing	The Reddit pixel is used to enable advertising on their website and to track behavior of the visitor after selecting the advertisement.	Session
Snapchat Snap Inc., United States Privacy statement	Marketing	Snapchat uses cookies to improve their advertising service by measuring your behavior on our website to provide more relevant advertisements.	30 days
Algolia Insights Algolia recommend, United States Privacy statement	Functional	Algolia provides a first party cookie to us. These cookies communicate with Segment and provide product recommendations to visitors. It measures the behavior of visitor with regards to the products on the website.	30 days

Gstatic Google LLC, United States Privacy statement	Functional	Gstatic is Google’s content delivery service which caches all static or unchanging files, in order to reduce load times.	Maximum of 6 months
Miscellaneous: First-party cookies with strictly functional purposes	Functional	These cookies enable the necessary functionalities of the website, such as remembering the selected language and whether consent is given for cookies, displaying the cookie banner, etc.	Maximum of 2 years

Enabling and disabling cookies

You can set your web browser to only accept cookies with your consent. Consult your browser guide for more information. Please note that many websites will not function optimally when cookies are disabled.

Deleting cookies

Most cookies have an expiry date. When an expiry date is set, the cookie is automatically deleted once that date passes. You can also choose to delete the cookies manually before the expiry date. Please consult your browser guide for more information.

What are your rights if Otrium processes personal data about you?

If you have any questions or would like to know what personal data we have about you, you can always contact us using the contact details below.

You have the following rights:

- **Right of access:** you have the right of access to the personal data we process about you.
- **Right to rectification:** you have the right to correct or supplement the personal data we process about you, e.g., if they are incorrect or incomplete.
- **Right to object:** you have the right to object to the processing of your personal data and to direct marketing.
- **Right to erasure:** you may request us to erase your personal data.
- **Right to withdraw your consent:** if you have consented to us processing personal data, you can withdraw your consent at any time.
- **Right to data portability:** if it is technologically possible, you have the right to have the personal data we process about you transferred to a third party.
- **Right to restrict processing:** in some cases, you can request that we restrict the processing of your personal data (temporarily or otherwise).

We may ask you for identification to fulfil your request. We need this information to ensure that the one requesting a certain data subject’s right with regard to the personal data concerning a specific person, is verifiably the person whom the personal data concerns.

We will generally reply to your request within one month. However, this period may be extended by two months depending on the specific privacy rights or the complexity of the request. If we extend this period, we will inform you in good time. Please ensure that your requests meet the exceptions and/or requirements for us to live up to these rights of data subjects (see chapter 3 of the GDPR).

If you wish to exercise any of your rights, you can do so by sending an email to privacy@otrium.com.

Changes to this privacy and cookie statement

When there is a change in our services, we may also need to change our privacy and cookie statement. Please consult this privacy and cookie statement regularly for the most up-to-date information.

Filing a complaint

Should you feel we have not been able to help you properly with any questions about your privacy, you have the right to file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Contact details

For questions about our privacy and cookie statement or your rights, you can always contact us using the information below:

Otrium B.V.

Danzigerkade 16A

1013 AP Amsterdam

Email address: privacy@otrium.com

Phone number: 020-2217184

Chamber of Commerce no.: 63996901