



PRIVACY STATEMENT – PRIVATE LABEL PORTAL

Last updated: 26 August 2026

1. INTRODUCTION

- 1.1** The Stillery B.V. ('we', 'us', or 'our') respects your privacy and is committed to protecting your personal data. This privacy statement explains how we collect, use, and protect the information you provide through our Private Label Portal, and what your rights are.
- 1.2** The portal is a business-to-business environment. The personal data we process concerns the representatives and contact persons of our (prospective) clients.

2. DATA CONTROLLER

- 2.1** The Stillery B.V. is the data controller responsible for your personal data. Our contact details are: The Stillery B.V., Herwijk 12, 1046 BC Amsterdam, The Netherlands. Email: info@the-stillery.nl. KvK: 69848556.

3. DATA WE COLLECT

- 3.1** Through our Private Label Portal, we collect and process the following categories of personal data:
- Identity Data: company name, contact person name, job title
 - Contact Data: email address, phone number, business address, invoicing contact details
 - Financial Data: bank account details (IBAN), VAT number, KvK number, invoicing address
 - Technical Data: login credentials (password stored hashed), IP address, browser type and version (user agent)
 - Usage Data: actions you perform in the portal (audit trail), such as creating, approving or changing a product
 - Production Data: product specifications, orders, and production history

- Evidence Data: records of the agreements you conclude and the documents you accept or sign digitally in the portal — the Terms & Conditions, shelf-life waivers, product approvals, barcode/artwork confirmations and production approvals — including the document version and cryptographic hash (SHA-256) of the accepted document, the server timestamp, your IP address, browser identification, the moment you opened the document and the exact wording you confirmed

4. PURPOSE OF PROCESSING

- 4.1** We process your personal data for the following purposes:
- To create and manage your portal account
 - To process and fulfill your production orders
 - To communicate with you about your orders and account
 - To issue invoices and process payments
 - To record and evidence the agreements you conclude through the portal (acceptance of the Terms & Conditions, waivers, approvals and confirmations), so that both parties can later establish what was agreed, by whom and when
 - To secure the portal and prevent misuse (access control, audit trail, abuse detection)
 - To comply with legal and regulatory obligations
 - To improve our services and portal functionality

5. LEGAL BASIS

- 5.1** We process your personal data on the following legal grounds (art. 6 GDPR):
- Performance of a contract (art. 6(1)(b)): setting up and running your account, handling your orders, communicating about them and invoicing
 - Legal obligation (art. 6(1)(c)): retaining financial and administrative records, complying with tax, excise, food-safety and other Dutch and EU laws



- Legitimate interest (art. 6(1)(f)): evidencing the agreements you conclude through the portal and defending our legal position, securing the portal and preventing fraud or misuse, and improving our services. We have balanced these interests against yours; you may object (art. 9)

5.2 We do not rely on your consent for operating your account, for handling your orders or for keeping evidence of the agreements you have concluded. Where we ever ask for your consent — for example for optional communications — we say so explicitly at that moment, and you can withdraw that consent at any time without affecting the processing described above.

6. DATA RETENTION

6.1 We retain your personal data for as long as necessary to fulfill the purposes for which it was collected, including to satisfy any legal, accounting, or reporting requirements. Financial and administrative records are retained for 7 years as required by Dutch law (art. 2:10 Civil Code, art. 52 General Tax Act).

6.2 Evidence Data (see 3.1) is retained for the duration of our business relationship plus 7 years, in line with the statutory record-keeping period and the limitation periods for contractual claims. These records are immutable: they cannot be altered or deleted by users of the portal, including our own staff.

6.3 After termination of our business relationship, we will securely delete or anonymize other personal data within 2 years, unless longer retention is required by law or by the periods above.

7. DATA SHARING AND PROCESSORS

7.1 We use the following service providers (processors) to operate the portal. Each processes data on our instructions under a data processing agreement:

- Supabase (database, authentication, file storage) — data hosted in the European Union (AWS region eu-north-1, Stockholm)

- Vercel (application hosting and delivery of the portal)
- Resend (transactional e-mail from the portal)
- Exact Online / Basecone (invoicing and accounting)

7.2 We may also share your personal data with professional advisors (accountants, lawyers) when necessary, with government authorities when required by law, and with business partners involved in fulfilling your orders (for example suppliers of packaging or logistics), limited to what they need.

7.3 Where a processor transfers data outside the European Economic Area, we rely on the safeguards of the GDPR, such as the European Commission's Standard Contractual Clauses or an adequacy decision (for the United States: the EU-US Data Privacy Framework).

7.4 We do not sell your personal data to third parties.

8. YOUR RIGHTS

8.1 Under the General Data Protection Regulation (GDPR), you have the following rights:

- Right of Access: request a copy of your personal data
- Right to Rectification: request correction of inaccurate data (most account details can be changed in the portal, subject to our approval)
- Right to Erasure: request deletion of your data, except where we must keep it under the retention periods in article 6
- Right to Restrict Processing: request limitation of data processing
- Right to Data Portability: receive the data you provided in a structured, machine-readable format
- Right to Object: object to processing based on our legitimate interests; we will then stop unless we have compelling legitimate grounds, such as evidencing an agreement you concluded



- Right to Withdraw Consent: where processing is based on consent, you may withdraw it at any time; this does not affect processing based on contract, legal obligation or legitimate interest

8.2 To exercise these rights, please contact us at info@the-stillery.nl. We respond within one month. Your own record of accepted documents and approvals is available at any time in the portal under Account details → Your signed documents.

9. DATA SECURITY

9.1 We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction. These measures include encrypted data transmission (TLS), hashed password storage, role-based access controls, row-level security in our database, an immutable audit trail of approvals and acceptances, and regular security assessments.

9.2 In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Dutch Data Protection Authority within 72 hours and inform you without undue delay where required.

10. COOKIES AND LOCAL STORAGE

10.1 The portal only uses strictly necessary cookies and browser storage: an authentication cookie that keeps you logged in (valid for up to 30 days of inactivity; renewed while you use the portal) and local storage for display preferences such as the number of rows per page and visible table columns.

10.2 We do not use analytics, advertising or third-party tracking cookies, and we do not load third-party scripts or fonts from external servers. Because all cookies and storage are strictly necessary for the service you request, no consent banner is required under the Dutch Telecommunications Act (art. 11.7a). Details are in our Cookie Policy in the portal.

11. CHANGES TO THIS STATEMENT

11.1 We may update this privacy statement from time to time. We will notify you of any significant changes by posting a notice on our portal or by sending you an email. The date of the last update is shown at the top of this document.

12. CONTACT & COMPLAINTS

12.1 If you have any questions about this privacy statement or wish to exercise your rights, please contact us: The Stillery B.V., email: info@the-stillery.nl.

12.2 If you are not satisfied with our response, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) at www.autoriteitpersoonsgegevens.nl.