

Privacy policy

1. Purpose of the policy

CT Import values the right to privacy and is committed to ensure all personal data is obtained, processed and used in a safe, secure, ethical and transparent way. Your privacy is important to us, and we appreciate your trust that we will use your personal data both carefully and sensibly, in conformity with the principles laid out in this Privacy Policy, which applies when you use our Services.

This Privacy Policy is meant to help you understand what personal data we collect about you, why we collect it, and what we do with it. References to personal data in this Privacy Policy include any information which directly or indirectly identifies you, such as your name, surname, online identifiers and e-mail addresses.

Please note that this Policy applies in conjunction with other policies and procedures. It does not establish contractual or legal rights for any persons, but intends to comply with 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 (hereinafter, the 'General Data Protection Regulation' or 'GDPR').

As your data controller, we determine why and how we process your personal data. This privacy policy outlines which personal data we collect about you (Section 3.1), what legal grounds we rely on to collect your personal data (Section 3.2), how we protect your personal data (Section 4), to whom we disclose your personal data (Section 5), if necessary outside the European Union (Section 6). In addition, we also define for how long we need to keep your personal data (Section 7) and which measures we adopt in order to securely and permanently remove your personal data when the right time comes (Section 8).

2. Who controls your personal data?

CT import is the controller of the personal data you submit to us and is responsible for the processing of your personal data under the applicable data protection legislation. Our registered address is Frans De Schutterlaan 11 2850 Boom Belgium. CT import is registered in Belgium under company number BE0637.833.594

3. How we collect and process your personal data

3.1. Personal data we collect about you

Because data privacy is of high importance for us, we intend to remain open and transparent about how we use your personal data. CT import will only collect your personal data where necessary for our Services.

Depending on your use of our Services and our websites, we may thus collect, use and disclose (i.e., process) the following types of personal data about you: your contact information, such as a name, surname, address, e-mail address, IP address and telephone number. For more information about the way we process personal data, we invite you to read the following sections.

Although we are technically considered 'data controllers', the ultimate control over your personal data remains with you at all times. Provided you give us a proof of your real identity, you have the right to request access to a copy of the personal data we currently maintain about you in a structured, commonly used and machine-readable format and obtain information regarding the processing.

3.2. Legal grounds for processing

Under the applicable data protection legislation, personal data may only be collected and processed based on a limited number of legal grounds. At CT import, we rely on one of the following grounds to process your personal data:

1. Necessity for the performance of a contract with you (e.g. when you purchase products from us);
2. Legal obligation to which CT import subject (e.g. when we handle your payment details);
3. Legitimate interests of CT import (e.g. when we send you marketing e-mails regarding products similar to the ones you already purchased from us);
4. Your explicit and informed consent.

4. How we protect your personal data

CT import is committed to the processing of your personal data in a lawful, fair and transparent manner. Accordingly, we will only use your personal data if we have a valid reason for doing so and provided you have been informed of the processing purposes beforehand, at the time we collected your personal data.

Moreover, CT import guarantees that any processing of your personal data will be limited to what is necessary, adequate and relevant in order to achieve the purposes for which personal data is collected. Whenever possible and technically feasible, CT import will use anonymized or pseudonymized data, e.g. for our internal statistics and financial reporting purposes.

Because the protection of your personal data is of the utmost importance to us, CT import is also dedicated to protect your personal data and the systems it is held in. We have defined and implemented adequate technical and organisational measures against any unauthorised access, unlawful use, accidental loss, corruption or destruction. This way, CT import is confident that your personal data will be processed on a strictly 'need to know basis', when and where appropriate and necessary.

As we are fully aware threats evolve and diversify and we wish to sustain your trust throughout the years, we regularly review and update our security measures and infrastructure, with a view to mitigate operational risks and maintain our security programs up to the latest industry-accepted standards and best practices.

5. External parties with whom we may share your personal data

Where relevant and necessary for the purpose of the processing activity, we may occasionally need to disclose your personal data to other appropriate organisations who have a need to know (so-called 'third party recipients'), based on our legitimate interest.

With the purpose of helping us understand more about your interests and preferences, offer you more relevant advertisements, we may for example share your personal data with data analytics companies and advertisers based on our legitimate interest. Additionally, we may share some of your personal data with external parties when you provide us with feedback and review about our products or our service.

We are also required to share some of your personal data with delivery couriers, such as when you order a product, and with financial institutions in order to verify your payment details, based on the performance of a contract.

Each time your personal data is shared externally, this will be covered by strict data processing agreements, where CT import remains the data controller and the third parties involved act as data processors. CT import shall restrict the access and transfer of your personal data to trusted third party recipients who demonstrate an adequate level of data protection. Moreover, these third-party recipients will be required to delete or return all the personal data to CT import after the end of the provision of Services relating to the processing and delete existing copies, unless the law requires storage of the personal data.

6. International transfers of your personal data

Insofar as your personal data needs to be transferred from the European Economic Area to a country outside of it which does not offer adequate protection of personal data, appropriate safeguards will be put into place to protect personal data to standards which are equivalent to the standards contained in this Privacy Policy. In other words, CT import will remain responsible for the processing of your personal data and will take the necessary measures to protect the processing thereof by relying e.g. on the EU-U.S. Privacy Shield.

7. How long we keep your personal data

As a general rule, CT import only keeps your personal data for as long as necessary to fulfil the purpose for which we initially collected it. However, because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. In addition, there are laws and regulations that apply and which set minimum periods for retention of personal data.

CT import will always ensure you are kept informed of the criteria used to determine the effective retention period as well as the underlying reasons thereof, which will depend on whether we process your personal data in the context of a contractual relationship with you or based on your explicit consent; whether we process the personal data for our own legitimate interest, or whether CT import is legally obligated to retain the personal data for a specific period or to comply with specific legal obligations.

8. How we erase your personal data

Under certain circumstances, and provided you give us a proof of your real identity, you may exercise your right to request the erasure of your personal data and have us inform third-party recipients to whom we provided your personal data of this request. Please be aware that this is only possible to the extent that the personal data is no longer necessary for the initial purpose (i), if the processing was based on your consent and you withdrew it (ii), or where you have already objected to the processing based on our legitimate interest (iii).

Except when we need to keep a copy of your personal data for statistical purposes, to establish, exercise or defend legal claims, you can rest assured CT import shall either securely dispose of or permanently anonymize your personal data once we have fulfilled the initial processing purpose and when further retention of your personal data is not necessary anymore.

9. Your rights as data subjects

For further information or if you wish to exercise one of your above-mentioned rights, please contact us at info@ctimport.com We will do our best to reply to your e-mail as soon as possible, and in any case within one month. If fulfilling your request necessitates more time, we will keep you informed

of this and come back to you within two additional months. It import will charge you nothing for this request, unless we have already provided you with the requested information previously or it appears unreasonably difficult for us to retrieve it. In such case, we will inform you beforehand of the administrative fee.

If you are not satisfied with the way we handled your request, you have the right to request the restriction of our use of your personal data and lodge a complaint with the supervisory authority responsible for the protection of personal data in your country of residence. Although we sincerely hope this won't be necessary, we have provided the contact details of the relevant data protection authorities below.

Belgium

Autorité de protection des données - Gegevensbeschermingsautoriteit

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