

Privacy Policy (version 2026-04-01)

Introduction

Welcome to privacy policy of the European companies operating under the ZND brand under the website 'www.znd.com'. These are the following legal entities ZND UK Ltd, ZND NL BV and ZND CE sp. z o.o.. These companies are hereinafter jointly and/or each individually referred to as "ZND Europe" or "we".

ZND Europe respects your privacy and is committed to protecting your personal data. This privacy policy explains how we collect, use, disclose and protect your personal data when you visit our website, contact us, or use our services, and informs you about your privacy rights and how the law protects you in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the UK GDPR.

1 Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how ZND Europe collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or submit a shortlist.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you.

Controller

For the purpose of data protection laws, the ZND Europe website (www.znd.com) is operated by the following companies, who act as **joint controllers** of your personal data:

- ZND UK Ltd – The Gateway, Parkgate, Rotherham, S62 6JL, United Kingdom
- ZND NL B.V. – John F. Kennedylaan 22, 5555XD Valkenswaard, The Netherlands
- ZND Central Europe Sp. z o.o. – ul. Głogowska 35b, 45-315 Opole, Poland

These companies jointly determine the purposes and means of processing personal data in relation to the ZND Europe website in accordance with Article 26 of the General Data Protection Regulation (GDPR). The essence of this joint controller arrangement — including the allocation of responsibilities between the three ZND entities — is made available to data subjects. A summary of the arrangement can be requested by contacting us at euprivacy@znd.com.

The joint controllers have agreed that ZND NL's Marketing Department is responsible for the administration of the ZND Europe website, marketing communications, and for handling data protection enquiries and data subject requests. Each ZND company remains responsible for personal data processed in relation to its own customers, sales activities, contracts, and financial administration.

The joint controllers have entered an arrangement in accordance with Article 26 GDPR which sets out their respective responsibilities for compliance with data protection laws.

ZND Europe has appointed a central contact point for all data protection and privacy-related enquiries.

Contact email for GDPR and privacy matters:
euprivacy@znd.com

Alternatively, you may also direct your data protection and privacy queries in a letter directed to the ZND joint controlling legal entity that is located in your country at the address listed above, made out to the attention of Marketing Department.

Supervisory Authorities

If you are in the European Economic Area (EEA) or the United Kingdom, you have the right to lodge a complaint with your local data protection supervisory authority. You may contact:

- UK: Information Commissioner's Office (ICO) – www.ico.org.uk
- Netherlands: Autoriteit Persoonsgegevens – www.autoriteitpersoonsgegevens.nl
- Poland: Urząd Ochrony Danych Osobowych (UODO) – www.uodo.gov.pl

You also have the right to lodge a complaint with the supervisory authority in the country where you live, work, or where you believe a breach of data protection law has occurred.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **"Identity Data"** includes first name, last name, username or similar identifier,.
- **"Contact Data"** includes billing address, delivery address, email address and telephone numbers.
- **"Financial Data"** includes bank account and payment card details.

- **“Transaction Data”** includes details about payments to and from you and other details of products and services you have purchased from us.
- **“Technical Data”** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **“Profile Data”** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **“Usage Data”** includes information about how you use our website, products and services.
- **“Marketing and Communications Data”** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **“Special Categories of Personal Data”** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3 How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms on our website. This includes personal data you provide when you:
 - apply to create an account on our website portal;
 - subscribe to our newsletter;
 - request marketing and/or brochures to be sent to you;
 - complete a contact form;
 - submit your shortlist basket;
 - give us feedback or raise an enquiry.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below
- Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU;
- (b) search information and optimisation providers such as Google based outside the EU.

Transfers of personal data to Google are governed by Standard Contractual Clauses (SCCs) approved by the European Commission pursuant to Article 46(2)(c) GDPR and/or US-VS Data Privacy Framework. For further information on these transfers, please contact us at euprivacy@znd.com.

4 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

We rely on consent to send marketing communications where required by law. Where permitted by law, we may send marketing communications based on our legitimate interests to existing customers. You can opt out at any time.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer or client on our portal system	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Responding to and dealing with any enquiries that you may raise	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Optained upon your permission and necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our products/services and grow our business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Optained upon your permission and necessary for our legitimate interests (to develop our products/services and grow our business)

Profiling and automated decision-making

[We use automated processing of your personal data — including Profile Data, Usage Data and Technical Data — to create a profile of your interests and preferences so that we can tailor the content, products and marketing communications we present to you (profiling). This processing is based on our legitimate interests (Article 6(1)(f) GDPR).

This profiling does not produce legal effects concerning you or similarly significantly affect you within the meaning of Article 22 GDPR. We do not make solely automated decisions that have such effects.

You have the right to object to profiling at any time by contacting us at euprivacy@znd.com. Where we rely on consent for any element of automated processing, you may withdraw that consent at any time.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can request to be added to our newsletter mailing list or request a copy of our brochure via our website.

Third-party marketing

When you sign up to our mailing list to receive our newsletter, your contact data (such as your name and email address) is shared with our email marketing provider so that we can send newsletters and marketing communications to you.

We use **Mailchimp** as our email marketing provider. Mailchimp processes personal data on our behalf as a data processor and only in accordance with our instructions. Mailchimp does not use your personal data for its own purposes.

Mailchimp may store and process your data outside the European Economic Area (EEA). Where this occurs, appropriate safeguards are in place in accordance with GDPR, including Standard Contractual Clauses.

You can unsubscribe from our marketing communications at any time by clicking the unsubscribe link in any email we send or by contacting us at euprivacy@znd.com.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

When you first visit our website, you will be asked to consent to the use of non-essential cookies via a cookie banner. You can accept or reject cookies and can change your preferences at any time. Non-essential cookies will only be placed on your device after you have given your consent.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

- External third parties such as our website hosting provider **[JKC Media B.V.]**, IT service providers, their sub-processors, and our third-party marketing company (Mailchimp), who provide email marketing services on our behalf. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

Some of our external service providers may be based outside the European Economic Area (EEA) or the United Kingdom. Where your personal data is transferred outside the EEA or UK, we ensure a similar degree of protection is afforded to it by ensuring that at least one of the following safeguards is implemented:

- Transfers to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the UK Government.
- Use of specific contracts approved by the European Commission and the UK Government which give personal data the same protection it has in Europe (Standard Contractual Clauses).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside the EEA or UK.

6 Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees,

agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7 Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

If you wish to exercise any of the rights set out above, please contact us as set out above.

You have the right to:

“Request access” to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

“Request correction” of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

“Request erasure” of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always

be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

“Object to processing” of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

“Request restriction of processing” of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

“Request the transfer” of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

“Withdraw consent at any time” where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Object to profiling. You have the right to object at any time to the processing of your personal data for profiling purposes, including profiling used for direct marketing.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.