



M&M Royalty Fashion Design B.V.

Privacy Statement

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1. Introduction M&M Royalty Privacy Statement

M&M Royalty Fashion Design B.V. (hereinafter referred to as M&M Royalty) takes your privacy seriously and will process your personal data with the utmost care. In order to give you the best possible picture of the various situations in which we process your personal data, we have opted for an extensive privacy statement. There are often situations in which M&M Royalty has to collect and process your personal data. Consider, for example, when sending invoices. It is important that you know what happens to your personal data and how you can let us know your wishes regarding the handling of your personal data.

This Privacy Statement applies to all privacy-sensitive information or personal data that you provide to us, for example when you send an e-mail to M&M Royalty. We clearly indicate how we store your data, how long it is stored and what exactly the purpose of the data processing is. In addition, we provide clear insight into how you can exercise your rights with regard to data processing.

What exactly does M&M Royalty do? M&M Royalty with the trade name M&M Royalty sells stylish clothing and accessories for men and women to consumers and is a standalone clothing brand. M&M Royalty sells its products internationally on mmroyalty.com and various stores.

M&M Royalty will use and process personal information in a secure manner. All articles in this Privacy Statement are in accordance with the applicable GDPR legislation ([General Data Protection Regulation, GDPR legislation](#)). This European privacy legislation has been applicable in the Netherlands since **25 of May 2018**.

Do you have any doubts or questions about the processing of data by M&M Royalty? Please feel free to contact us via the details below.

info@mmroyalty.com | mmroyalty.com
Chamber of Commerce No. 82618496

2. Categories of personal data

It is necessary for us to request certain personal data in order to be able to help our customers and partners. Personal data is data that can be traced back to a natural person. The personal data that we (generally) process are:

- First name and last name;
- (Personal) e-mail address (please note: the GDPR also includes certain Company e-mail addresses under personal data, an example is the e-mail address Klaas.Kansen@Bedrijf.nl);
- Address details;
- Bank details;
- Contact information, including phone number.

We only store and use the personal data provided directly by you via our website, completed contact forms, or data that was clearly provided for processing by M&M Royalty.

3. Basis and purpose for data processing

Under the GDPR legislation, we are obliged to have a lawful basis for the processing of personal data. **Article 6 paragraph 1 sub a, sub b and sub c of the GDPR** apply to our situation: the processing of personal data is done on the basis of your consent, because it is necessary for the performance of an agreement between you and M&M Royalty or because it is necessary to comply with legal obligations.

Article 13 paragraph 1 sub c of the GDPR then requires us to clearly indicate for which '**processing purposes**' the personal data are collected. What exactly are 'processing purposes'? These are the purposes, also known as the reasons, for collecting personal data.

We therefore provide an overview below with the different processing purposes. For each processing purpose, we provide an explanation of the data used for this purpose and on what legal basis the data is stored. The retention periods of this data are then described **under Chapter 4, Period of storage**.

➤ **There are a number of purposes for which M&M Royalty collects your personal data;**

1. Contacting us

Have you sent an e-mail to our **e-mail address** (info@mmroyalty.com)? Or have you left information via our contact form, social media or by telephone? Then we store this data so that we can approach you further.

The bases for processing in this context: *our legitimate interest* (we need to be able to communicate with you in order to be able to handle or follow up on questions or complaints).

2. Performing of service

When proceeding to perform our service, M&M Royalty needs certain information. Without this information, it is not possible for M&M Royalty to perform the service properly. Consider, for example, the e-mail address, name, telephone number and address.

The bases for processing in this context: *execution of the agreement* (compliance with the agreement as concluded with our customer), *legal obligations* (according to the standards set by applicable laws and regulations for the performance of our services) and a *legitimate interest* (being able to properly execute the agreement with our customers).

3. Accounting

For this processing purpose, M&M Royalty stores the name, job title, billing address, bank details (including name of the bank/IBAN/BIC), contact details including telephone number and e-mail address.

The basis for the financial administration processing purposes: *Execution of the agreement* (in case the agreement has been concluded with the customer); *legal obligations* (including our administration and retention obligations, tax obligations and obligation to draw up annual accounts and annual reports); *our legitimate interest* (to be able to carry out our regular business activities in a correct and effective manner; to be able to provide and improve our services, for example to be able to protect our interests during a dispute or legal proceedings and to prevent fraud or other unlawful behavior).

4. Relationship management

It is important for M&M Royalty to store and process your feedback, complaints and wishes. If M&M Royalty needs to contact you further (for example about the delivery of the products), M&M Royalty must be able to do so. For this purpose, we store data such as your name, telephone number, e-mail, order history, Chamber of Commerce number, business address, and if possible data in the context of a customer satisfaction survey.

The bases for processing in the context of this purpose are: *performance of the agreement* (if it concerns a business customer) and *our legitimate interest* (being able to initiate, maintain and maintain the customer relationship; to be able to perform the associated administration, correspondence and relationship management activities and to be able to perform our services properly).

4. Period of storage

Above we have indicated for which processing purposes we use your personal data. According to **Article 13 paragraph 2 sub a of the GDPR**, we must mention the storage period for the personal data. In addition, it is important to realize that all data will be stored for the period that the services of M&M Royalty are being performed, or the period that it can reasonably be assumed that services are being performed. Each last moment of contact between you and M&M Royalty is considered a new beginning of the retention period.

Please note! It is possible that data provided and processed for one purpose, transfer to another purpose. As a result, a new retention period begins. For example, when data is provided via a contact form and is eventually transferred to a service. When the same data is used, the retention period of this data will be extended to that of the following purpose.

➤ The storage period for each processing purpose

1. Contacting us

If no relevant agreements, collaborations or agreements follow from our contact with you, the data collected for this purpose will be stored for **a maximum of 1 year**.

2. Performing service

Data provided for the performance of our services will be stored for a maximum period of **5 years** after completing the service and sending or receiving the (last) payment. This also includes data that is used for the shipment of the products.

3. Accounting

According to the law, we are obliged to keep invoices (and other records). After all, the tax authorities should have the opportunity to check M&M Royalty. According to the [requirements of the tax authorities](#), we must keep our invoices for **at least 7 years**. We comply with these requirements in all cases. After the expiry of this period, we will retain your personal data for **a maximum period of 2 years**.

4. Relationship management

Data in the context of relationship management will in any case be stored for the duration in which we work with you. After completion of the work, data will be retained **for a maximum of 5 years**, unless legal obligations or legal procedures require a longer period.

5. Recipients of personal data

In principle, M&M Royalty only shares personal data with third parties if this is necessary for good business operations or the proper performance of our services. The sharing of personal data only takes place when this is strictly necessary, such as providing data for a notification by e-mail that a product is back in stock or for the delivery of a product.

In any case, M&M Royalty shares personal data with the Tax and Customs Administration/government agencies. In order to comply with our tax liability and/or any other legal regulation, we share the necessary personal data with the Tax and Customs Administration and other government authorities, if we are legally obliged to do so.

In all cases, M&M Royalty, as the controller, will comply with the GDPR legislation, specifically **Article 28 et seq. GDPR**.

Cookies

Do you want to know which cookies M&M Royalty places on your device? Please consult [our Cookie Policy](#).

6. Security

The Devices where your personal data are stored on are locked with a password and/or fingerprint scan and/or facial recognition. This concerns the necessary devices, such as computers, laptops and mobile phones.

Your visit to the M&M Royalty website is also secured by an "http" security. This means that your connection to M&M Royalty is private. With this we ensure that your personal data remains safe during your website visit.

When you receive an e-mail reminding you that a product is back in stock, this is done by means of a secure software. Your personal data is protected by this software.

All forms of physical data are stored by M&M Royalty in a closed office. Only authorized personnel have access to the physical data and are the only ones who have the opportunity to view this data.

For the sake of completeness, more information about the security that M&M Royalty uses:

- The devices on which personal data is stored are protected by a password.
- The software used to inform you of a restock is protected against unauthorized access to personal data.
- The transmission of your data is done via a secure internet connection. You can see this in the address bar 'http' and the padlock in the address bar.
- Physically stored personal data is stored in a secure cabinet inside a closed office space where the building of the office is equipped with an alarm installation.

7. Your rights in relation to your personal data

Below we give you an overview of the rights you have regarding your personal data and our use thereof. Although we collect and process personal data in a minimal way, we think it is important to point out the rights that you have under the GDPR.

a. Right of access (Article 15 GDPR)

At any time you have the right to request a summary of your data, which have been recorded and stored by us. This can be done by sending an e-mail or via telephone contact. You will then receive a clear overview of your data that M&M Royalty processes.

b. Right to rectification (Article 16 GDPR)

Is your data (which we have in storage) no longer correct or has it changed? Then you have the right to have this rectified.

c. Right to data portability (Article 20 GDPR)

According to the GDPR, you have the right, if reasonable and possible, to request that we transfer data to another party.

d. Right to erasure (Article 17 GDPR)

In certain cases, you have the right to ask M&M Royalty to destroy your data. You can do this by invoking **the right to be forgotten**. In the following situations, M&M Royalty must destroy your personal data if:

- M&M Royalty no longer needs your data for purposes for which we have collected the data.
- You have expressly given permission to M&M Royalty to use data, but are now withdrawing it. This can be done, for example, via the '**unsubscribe button**' for newsletters.
- You object to data processing. **You have an absolute right to object to direct marketing.** Are your interests greater than the interests of M&M Royalty with regard to the processing of your data? Then you have a relative right to object. This means that deletion does not have to take place immediately, but only when it has been established that your interest outweighs the purpose of processing the data.
- If M&M Royalty processes your data unlawfully, you have the option to ask for the data to be deleted. This is possible, for example, if there is no legal basis for the processing of your personal data.
- If M&M Royalty has exceeded a statutory retention period, M&M Royalty is obliged to delete your data.
- Are you, as a data subject, younger than 16 and M&M Royalty has collected your data? You can then ask M&M Royalty to delete the data immediately.

There are exceptions to the right to be forgotten under the GDPR. For more information, see the next [page](#).

e. Right to file a complaint with the Dutch Data Protection Authority

You always have the right to file a complaint with the Dutch Data Protection Authority if you have the feeling that M&M Royalty has not handled your personal data correctly. This can be done via this [link](#). The Dutch Data Protection Authority will then handle this complaint.

f. Right to stop data consumption, objection (Article 21 GDPR)

You have the right to object to the processing of your data at any time. Especially in the case of 'direct marketing'.

Do you want to make use of the aforementioned rights?

In most cases, an e-mail to M&M Royalty is enough to exercise your rights. Do we doubt whether you are who you claim you are? Then we can ask you to provide a copy of your proof of identity, as [prescribed by the Dutch government](#). In most cases however a less invasive method of identity verification will be sufficient.

M&M Royalty would also like to point out that you have the opportunity to file a complaint with the Dutch national supervisory authority, the Dutch Data Protection Authority. This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

8. Duties

M&M Royalty processes your personal data, as indicated, on the basis of various legal bases. Your personal data will never be sold to a third party.

The data that are mandatory to provide are the minimum necessary personal data that are needed for the proper performance of our services. If you do not provide us with this mandatory information, M&M Royalty will not be able to (properly) provide the services.

If it is necessary to share your data with other parties, your permission will of course first be requested, this can be done, among other things, by changing our Privacy Statement. We always make changes known by placing the latest version on our website.

M&M Royalty reserves the right to disclose data when required to do so by law, or when M&M Royalty deems it justified to comply with a legal request or process. Also when it comes to ownership or protecting M&M Royalty. We try to respect your right to privacy as much as possible.

9. Secrecy

Both parties (M&M Royalty and customer) are obliged to maintain the confidentiality of all confidential information that they have obtained from each other or from other sources in the context of an agreement. Information is considered confidential if this has been communicated by the other party, or if this results from the nature of the information.

10. General Data Protection Regulation and M&M Royalty

M&M Royalty reserves the right to disclose data when this is required by law, or when M&M Royalty deems this justified in order to comply with a legal request or process, also when it comes to ownership or protecting M&M Royalty. We try to respect your right to privacy as much as possible.

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