



ACDEON B.V.

Gasthuisplaats 1
2611 BN Delft
The Netherlands

Chamber of Commerce number: 97878421
VAT ID nr.: NL868271834B01
Bank Account [EUR]: NL09BUNQ2159258024
Bank Account [USD]: WISE 250768783669566

ACDEON - Privacy & Data Protection Overview

Executive summary

ACDEON B.V. ("ACDEON") processes only limited personal data, mainly business contact details submitted via the website

contact form or exchanged in a professional context. Data is used to handle enquiries, support representation activities

for manufacturers, and maintain business relationships. ACDEON does not sell personal data, does not use third-party

marketing trackers and uses privacy-friendly, cookieless analytics hosted in the EU.

This document is an overview of how ACDEON handles personal data under the EU General Data Protection Regulation (GDPR)

and the Dutch implementation thereof. It is not a contract but a transparent explanation for customers, partners and website visitors.

1. Scope of ACDEON's activities

ACDEON operates as a specialised representation and consulting company.

Registered business scope (Dutch):

Het verlenen van advies en dienstverlening aan bedrijven in het Verenigd Koninkrijk en de Europese Unie, waaronder het optreden als vertegenwoordiger van een of meerdere ondernemingen. De activiteiten zijn gericht op de hightech industrie, waaronder de lucht- en ruimtevaart, defensiegerelateerde industrie, maritieme sector, agrarische industrie, de automobielenindustrie en de semi-conductor industrie.

In practice this means ACDEON advises and supports companies in the United Kingdom and the European Union, and represents

selected manufacturers in high-tech sectors such as aerospace, defence-related industries, maritime, agricultural, automotive and semiconductor manufacturing.

2. Categories of personal data

ACDEON mainly processes:

- Basic business identity data: name, role, company name.
- Contact details: business email address, optionally a business phone number.
- Enquiry content: free-text description of the question or project.
- Technical web data: pseudonymous analytics data (for example page views and device type) via Matomo in a cookieless, privacy-friendly configuration.

ACDEON does not intentionally collect special categories of data (such as health data or political opinions)



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and asks

correspondents not to include such information in enquiries.

3. Purposes and lawful basis (GDPR)

ACDEON processes personal data only where there is a clear purpose and lawful basis under the GDPR.

Main purposes and corresponding legal bases:

a) Handling contact form enquiries and email requests

- Purpose: to respond to questions from engineers, buyers and potential partners.
- Data: name, role, company, email address, phone (if provided), enquiry text.
- Legal basis: GDPR Article 6(1)(b) - processing is necessary to take steps at the request of the data subject prior to entering into a contract, or to perform a (potential) contract.

b) Relationship management and business development

- Purpose: to maintain communication with existing and potential manufacturers, distributors and customers.
- Data: professional contact details and correspondence history relevant to the relationship.
- Legal basis: GDPR Article 6(1)(f) - legitimate interest in running and growing a specialised representation business.

ACDEON's interest is balanced against the limited impact on the individuals concerned.

c) Security and website analytics

- Purpose: to keep the website reliable, understand general usage patterns and improve user experience.
- Data: pseudonymous visit data such as visited pages, timestamps and technical device/browser information, collected via Matomo without tracking cookies.
- Legal basis: GDPR Article 6(1)(f) - legitimate interest in maintaining a secure and usable website, implemented in a privacy-friendly way.

4. Data retention

ACDEON retains personal data only as long as necessary for the purposes described above.

Typical retention periods:

- Contact enquiries: normally not longer than reasonably required to handle the enquiry and follow-up. In many cases this is 6-24 months, depending on the nature of the cooperation.
- Business relationship data: as long as ACDEON has an active relationship with the company or until the data is no longer needed for that relationship.
- Technical analytics data: retained in Matomo for a limited period consistent with privacy-friendly



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configuration.

ACDEON periodically reviews correspondence and analytics data and deletes information that is no longer required.

5. Data minimisation principles

ACDEON applies the following principles:

- Only collect data that is necessary for the enquiry or business relationship.
- Do not request sensitive categories of data.
- Do not build detailed personal profiles for marketing or tracking.
- Limit access to those within ACDEON who need the information to perform their tasks.

6. Data sharing

Personal data is not sold. Data is shared only in limited, business-relevant situations, for example:

- With represented manufacturers, where this is necessary to answer a technical or commercial question, or to prepare a quotation or proposal.
- With IT service providers that host or support ACDEON's systems (such as hosting or email), under agreements that respect EU data protection requirements.

In all cases, sharing is limited to what is necessary for the specific purpose.

7. International transfers

ACDEON aims to keep personal data within the European Economic Area (EEA). If data needs to be shared with a manufacturer or partner outside the EEA, this is done only where appropriate safeguards exist under the GDPR (for example, based on Standard Contractual Clauses or an equivalent mechanism), or where an exception from the GDPR is applicable for the particular situation.

8. Cookies and analytics

The ACDEON website uses Matomo analytics in a cookieless, privacy-friendly configuration hosted on EU-based infrastructure. No third-party marketing cookies or tracking pixels (such as Google Analytics, Meta, or advertising networks) are used.

This means:

- No advertising or cross-site tracking cookies.
- Analytics data is used only in aggregate to understand general website usage.



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- IP addresses are not used to build personal profiles.

9. Security measures (high-level)

ACDEON uses reasonable technical and organisational measures to protect information, including:

- Strong, unique passwords for critical accounts.
- Two-factor authentication (2FA) where available.
- Regular software updates and security patches on work devices.
- Encrypted connections (HTTPS) for the website and key services.
- Regular backups of important business data.

More detailed information is available in the separate "Security Baseline" and "Information Security & Data Governance" documents.

10. Rights of data subjects

Under the GDPR, individuals have rights over their personal data, including the right to:

- Request access to their data.
- Request correction of inaccurate data.
- Request deletion of data where there is no longer a valid reason for processing.
- Object to certain forms of processing, particularly where based on legitimate interests.
- Request restriction of processing in specific circumstances.

ACDEON will assess and respond to such requests in line with Dutch and EU law.

11. How to contact ACDEON about privacy

For questions about this overview or to exercise your rights under the GDPR, you can contact ACDEON by using the website

contact form and clearly indicating that the message concerns a "Privacy / GDPR request".

Document version and status

Document: ACDEON Privacy & Data Protection Overview

This document reflects ACDEON's practices under Dutch and EU law as of 9 December 2025.

It is reviewed periodically and updated when necessary (for example when services or regulations change).