

Privacy Policy Alukwa B.V.

Version date: August 25, 2026

At Alukwa, we take the protection of your privacy and personal data seriously. We process personal data carefully, confidentially and in accordance with the General Data Protection Regulation ("GDPR") and other applicable privacy legislation.

In this Privacy Policy, we explain what personal data we collect, why we process this data, with whom we may share it, how long we retain it and what rights you have.

1. Who are we?

Alukwa specialises in the design, manufacture, installation and maintenance of automated doors, hatches, lifts and other bespoke systems made from aluminium and stainless steel for the international superyacht industry.

Alukwa is the data controller for the processing activities described in this Privacy Policy.

Alukwa B.V.

Meer en Duin 60

2163 HC Lisse

The Netherlands

Telephone: +31 (0) 252 621 111

Email: info@alukwa.com

Chamber of Commerce number: 34107582

2. Who does this Privacy Policy apply to?

This Privacy Policy applies, among others, to:

- visitors to our website;
- customers and prospective customers;
- contact persons at shipyards, yacht builders and other clients;
- suppliers and business service providers;
- other business relations;
- people who contact us;
- job applicants.

3. What personal data do we process?

The personal data we process depends on your relationship with Alukwa and the way in which you communicate with us.

If you are a customer, prospective customer or business relation

We may process the following data:

- name and contact details;
- name of your employer or organisation;
- job title and department;
- business address;
- telephone number;
- email address;
- correspondence and notes from conversations;
- quotation, order and project details;

- appointments and agreements;
- invoice and payment details;
- technical and operational information necessary to carry out a project;
- other information that you provide to us.

If you are a supplier or service provider

We may process, among other things:

- name and business contact details;
- employer or company name;
- job title;
- quotation, order and contract details;
- invoice and payment details;
- correspondence;
- other information necessary for our business relationship.

If you contact us

We may process:

- your name;
- your telephone number and email address;
- your organisation and job title;
- the content of your question, request or message;
- any documents or other information you provide.

If you visit our website

We may process technical data, such as:

- IP address;
- browser type;
- device type;
- pages visited;
- date and time of your visit;
- data collected through cookies or similar technologies.

More information about the cookies used by Alukwa should be included in a separate Cookie Policy or cookie overview on the website.

If you apply for a job with us

We may process, among other things:

- name and address;
- telephone number and email address;
- curriculum vitae;
- cover letter;
- education and work experience;
- relevant diplomas and certificates;
- availability;
- references, where agreed with you in advance;
- information you provide during the application process.

As a general rule, Alukwa does not request medical information or other special categories of personal data during an application process unless there is a clear legal basis for doing so. Employers are permitted to ask questions about health information only to a very limited extent during recruitment.

4. For what purposes do we process personal data?

Alukwa may process personal data for the following purposes:

- responding to questions and requests;
- preparing and following up quotations;
- entering into and performing agreements;
- project management, engineering, production, installation and delivery;
- providing service, maintenance and aftersales support;
- communicating with customers, suppliers and other business relations;
- planning, administration, invoicing and payment processing;
- quality assurance and improving our services;
- handling complaints, disputes and claims;
- securing and improving our website and IT systems;
- complying with legal and administrative obligations;
- recruitment and selection;
- relationship management and business communications;
- protecting our rights, property and business interests.

5. On what legal grounds do we process your data?

Alukwa only processes personal data where there is a valid legal basis for doing so.

Depending on the circumstances, we process your personal data:

For the performance of a contract

For example, when we perform an agreement with you or your company, process an order, carry out a project or provide services.

To take steps prior to entering into a contract

For example, when you request a quotation or apply for a job at Alukwa.

To comply with a legal obligation

For example, tax and administrative retention requirements or safety-related obligations.

On the basis of a legitimate interest

For example, for:

- business communications;
- relationship management;
- improving and securing our website;
- fraud prevention;
- defending legal claims;
- internal administration and business operations.

Where we rely on a legitimate interest, we balance this interest against your privacy interests.

On the basis of consent

In some cases, we ask for your consent, for example for certain non-essential cookies or to retain job application data for a longer period. You may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.

6. With whom do we share your personal data?

- Alukwa may share personal data with parties necessary for our business operations and services, including:
- IT and hosting service providers;
- software providers;
- administration and accounting firms;
- banks and payment service providers;
- carriers and logistics service providers;
- external service engineers, subcontractors and technical partners;
- advisers, accountants and lawyers;
- recruitment and HR service providers;
- government authorities and supervisory bodies where we are legally required to provide data.

Where an external party processes personal data on behalf of Alukwa, we enter into a data processing agreement where required. This agreement includes arrangements concerning confidentiality, security and the use of personal data.

Alukwa does not sell your personal data to third parties.

7. Is data processed outside the European Economic Area?

Certain suppliers or IT service providers may process personal data outside the European Economic Area ("EEA").

Where this occurs, Alukwa ensures that appropriate safeguards are in place, for example because:

- the country concerned has been recognised by the European Commission as providing an adequate level of data protection;
- Standard Contractual Clauses approved by the European Commission are used;
- other legally permitted safeguards are applied.

8. How long do we retain personal data?

Alukwa does not retain personal data for longer than necessary for the purpose for which it was collected, unless a longer retention period is required by law or otherwise necessary. The GDPR does not specify a fixed retention period for all categories of personal data; organisations must therefore determine retention periods based on the purpose of processing and applicable legal obligations.

As a general rule, the following principles apply:

- financial administration data is retained for the applicable statutory retention period;
- contract, project and customer data is retained for as long as necessary to perform the agreement and deal with any subsequent questions, warranties, claims or disputes;
- general contact requests are deleted once they have been dealt with and the data is no longer required;
- data relating to prospective customers is periodically reviewed and deleted when it is no longer relevant;
- website and cookie data is retained in accordance with the periods specified in the Cookie Policy;
- data relating to unsuccessful job applicants is generally deleted no later than four weeks after the end of the application process;
- with consent, application data may be retained for a longer period, for example for future vacancies, generally for a maximum of one year.

The Dutch Data Protection Authority (Autoriteit Persoonsgegevens) identifies four weeks after the end of the application process as a customary retention period and a maximum of one year as a reasonable period where an applicant has consented to longer retention.

9. How do we protect your personal data?

Alukwa takes appropriate technical and organisational measures to protect personal data against:

- loss;
- unauthorised access;
- unauthorised alteration;
- unlawful disclosure;
- destruction;
- other unlawful use.

These measures may include access restrictions, secure IT systems, backups, confidentiality agreements and agreements with suppliers.

Only employees and external parties who require the data to perform their work are given access to personal data.

10. Cookies

Alukwa's website may use cookies and similar technologies.

Cookies may be used, among other things, to:

- ensure that the website functions properly;
- remember preferences;
- analyse website usage;
- improve the website;
- support marketing activities.

Cookies requiring consent will only be placed after the visitor has given consent.

11. Your privacy rights

Depending on the circumstances, you have the following rights:

- the right to know what personal data we process about you;
- the right of access;
- the right to have inaccurate data corrected;
- the right to have incomplete data completed;
- the right to have data erased;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- the right to withdraw consent;
- the right not to be subject solely to certain forms of automated decision-making.

These rights are not absolute. In some circumstances, Alukwa may or must reject a request in whole or in part, for example due to a statutory retention obligation or the need to establish, exercise or defend legal claims.

The GDPR grants data subjects various privacy rights, including the right to access the data processed by an organisation and information about how that data is processed.

You can submit a request via:

info@alukwa.com

Please clearly state which right your request relates to. To prevent misuse, we may ask you to provide additional information to verify your identity. We will respond within the legally applicable timeframe.

12. Filing a complaint

Do you have a complaint about the way Alukwa handles your personal data? Please contact us first so that we have the opportunity to investigate your complaint.

You also have the right to lodge a complaint with the Dutch supervisory authority:

Autoriteit Persoonsgegevens

Postbus 93374
2509 AJ Den Haag
The Netherlands

The Autoriteit Persoonsgegevens is the independent supervisory authority responsible for protecting personal data in the Netherlands.

13. Links and third-party websites

Alukwa's website contains links to websites operated by other organisations. Alukwa is not responsible for the way in which these external parties process personal data.

We recommend that you read the Privacy Policy of the relevant website.

14. Changes to this Privacy Policy

Alukwa may amend this Privacy Policy if our services, website, business operations or applicable legislation change. The most recent version will always be published on our website. The date of the latest revision is stated at the top of this Privacy Policy.

15. Contact

Do you have any questions about this Privacy Policy or about the processing of your personal data? Please contact us:

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