Privacy Policy – RedOrange Industry

1. Who we are

RedOrange Industry B.V. is the controller for the personal data described in this policy, under the EU General Data Protection Regulation (GDPR).

Company	RedOrange Industry B.V.
Address	Aquamarijnstraat 61, 7554 NN Hengelo, The Netherlands
Chamber of Commerce (KvK)	32142478
VAT	NL820104243B01
Contact	info@redorangeindustry.com

This policy covers www.roindustry.com (including the webshop and customer account), and the personal data of contact persons at our customers, suppliers and prospects that we process in our day-to-day business: quotes, orders, deliveries and invoicing.

RedOrange Industry supplies business customers, mainly in the marine, offshore, electrical installation and infrastructure sectors. We mostly process business contact data, no data of consumers.

2. Which personal data we process

We only process data you give us or that arises from our business relationship:

- **Contact details:** name, job title, company, business email address, phone number.
- **Account and order data:** login details for the webshop, delivery and invoice addresses, orders, and other transactional data which is relevant
- **Communication:** the content of emails, requests for quotation (RFQs), attachments and other messages you send us.
- **Financial data:** company bank details, payment and invoice history.
- **Website data:** IP address, browser type, pages visited and cookie data (see section 9).

We do not intentionally collect special categories of personal dataand ask you not to send these to us.

3. Purposes and legal bases

We process personal data only for the purposes below, each with a legal basis under Article 6 GDPR.

Purpose	Legal basis (Art. 6 GDPR)
Handling quotes, orders, deliveries and invoices	Performance of a contract (b)
Managing your webshop account	Performance of a contract (b)

Purpose	Legal basis (Art. 6 GDPR)
Answering questions and requests for quotation	Legitimate interest (f) / pre-contractual steps (b)
Sourcing products from suppliers for your order	Performance of a contract (b)
Accounting and tax records	Legal obligation (c)
Export control and customs documentation	Legal obligation (c)
Processing communication with the help of AI agents (section 4)	Legitimate interest (f): efficient, fast service
Sending product news and offers to business customers	Legitimate interest (f); you can opt out at any time
Website security and statistics	Legitimate interest (f)
Non-essential cookies	Consent (a)

Where we rely on legitimate interest, we have weighed our interest against your privacy. You may object to this processing at any time (section 10).

4. Use of AI agents (servers in the United States)

RedOrange Industry uses AI agents for commercial purposes. These AI services are provided by [AI provider, e.g. Anthropic PBC] and run on servers located in the United States.

What the AI agents do

- Reading and summarising incoming emails, requests for quotation and purchase orders.
- Looking up products, prices and stock, and preparing quotes and orders in our business systems.
- Drafting replies, delivery notes, labels and other documents.
- Updating supplier and order status overviews.

Which data they process

Business contact details, order and quote data, and the content of messages and attachments you send us.

Safeguards

- A RedOrange Industry employee always reviews and approves output before it is sent to a customer or supplier, or before an order is confirmed.
- The AI agents do not make decisions or may write in ERP systems about you with legal or similarly significant effects. There is no automated decision-making as meant in Article 22 GDPR.
- We have a data processing agreement with the AI provider. Under the provider's commercial terms, your data is not used to train its AI models.
- Access is limited to authorized RedOrange Industry staff.

You can object to the use of AI agents for your communication at any time by emailing info@redorangeindustry.com. We will then handle your requests manually.

5. Who receives your data

We never sell your personal data. We only share it where needed for the purposes in section 3.

Recipient	Why	Location
Exact Online (Exact Group B.V.)	Accounting, quotes, orders, invoicing	EU
Microsoft 365 (Microsoft Ireland)	Email, documents, file storage	EU / US
[AI provider, e.g. Anthropic PBC]	AI agents (section 4)	US
[Website and webshop hosting party]	Hosting of roindustry.com	NL
Suppliers and manufacturers	Sourcing and delivering your order	EU and outside the EU
Carriers and freight forwarders	Shipping your order	EU and outside the EU
Customs authorities and tax authority	Legal obligations	Netherlands / destination country
Accountant	Annual accounts and audit	Netherlands

Parties that process data on our behalf (processors) have signed a data processing agreement with us.

6. Transfers outside the European Economic Area

Some recipients, including our AI provider, are located in the United States. We only transfer personal data outside the EEA with an appropriate safeguard:

- **United States:** the EU-U.S. Data Privacy Framework (adequacy decision of the European Commission, 10 July 2023) where the recipient is certified, and otherwise the EU Standard Contractual Clauses (SCCs).
- **Other countries:** an adequacy decision of the European Commission, or SCCs. For shipments, transfer may also be necessary to perform our contract with you (Article 49(1)(b) GDPR).

You can ask us for a copy of the safeguards used via info@redorangeindustry.com.

7. How long we keep your data

We keep personal data no longer than needed for its purpose.

Data	Retention period
Invoices, orders and accounting records	7 years (Dutch tax law, Art. 52 AWR)

Data	Retention period
Quotes and correspondence without an order	2 years after last contact
Webshop account	Until you close the account, plus 1 year
Contact details for product news	Until you opt out
AI agent processing	Per the AI provider's retention terms; no longer than [30] days at the provider
Website statistics and cookies	See section 9

8. Security

We protect your data with appropriate technical and organisational measures, including:

- Encrypted connections (HTTPS/TLS) for the website and our business systems.
- Personal accounts with multi-factor authentication for staff.
- Access only for employees who need the data for their work.
- Confidentiality obligations for staff and processors.

If a data breach occurs that poses a risk to you, we report it to the Dutch Data Protection Authority within 72 hours and inform you when required.

9. Cookies

The webshop uses functional cookies that are needed to run it, such as your session, shopping cart, language, currency and login status. These do not require consent.

Analytics or marketing cookies are only placed after you give consent via the cookie banner. You can withdraw consent at any time or delete cookies in your browser settings.

10. Your rights

You have the right to:

- access the personal data we hold about you;
- have incorrect data corrected;
- have data deleted, unless we must keep it by law;
- restrict processing;
- object to processing based on legitimate interest, including direct marketing and the use of AI agents;
- receive your data in a portable format;
- withdraw consent at any time.

Send your request to info@redorangeindustry.com.

11. Complaints

We would like to hear from you first if you have a complaint. You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

12. Changes to this policy

We may update this policy, for example when we start using new tools. The latest version is always available on www.roindustry.com.

Version 2.0 – October 2026.