

# PRIVACY STATEMENT

## **Action respects your privacy.**

When you shop in our stores, browse our website, use our app, or create a MyAction account, you share certain personal data with us. Action finds data protection of great importance and is committed to upholding privacy principles and data protection. This Privacy Statement explains which data we process, why we process it, and what choices and rights you have.

## **Who we are**

Action Service & Distributie B.V. and Action Nederland B.V. jointly determine how your personal data is processed and act as joint controllers under data protection law. Throughout this Privacy Statement, when we refer to “Action”, “we”, “us” or “our”, we mean these companies, unless stated otherwise.

## **What this Privacy Statement covers**

This Privacy Statement applies when you:

- shop in our stores,
- interact with Customer Service,
- appear on our CCTV cameras,
- visit our website or web-shop,
- use the Action app,
- receive marketing communications,
- create a MyAction account or use your customer card,
- take part in reviews, competitions or promotions.

Some features or services may not be available in every country we are located. If a feature does not exist where you live, the related section of this Privacy Statement will not apply to you.

## **1. How we use your personal data**

### **1.1. Shopping at Action**

#### **1.1.1. Purchases and orders in our stores**

When you make a purchase in one of our stores, we process certain information to complete your purchase and run our business responsibly.

## *Payments*

When you pay for your purchases in one of our stores, your payment is processed securely by our payment service provider (Adyen B.V.). The information processed depends on the payment method you choose and may include:

- transaction amount and date,
- payment method,
- limited card details (e.g., masked card number),
- the store where you made the purchase,
- products purchased (e.g., items, quantities, prices),
- technical payment data needed to complete the transaction.

We use this information to:

- process your payment and complete your purchase, as this is necessary to execute our agreement with you,
- detect and prevent fraud or misuse based on our legitimate interest in ensuring secure payments, and
- analyse payment patterns on an aggregated, non-identifiable level, based on our legitimate interest in improving our store operations and services.

We store purchase and payment information for a period of seven years in order to comply with applicable tax and accounting obligations.

## *Large orders*

If you place a large order in one of our stores, we may ask for your name and telephone number so we can prepare your order and keep you informed about its status. We process this information to execute our agreement with you and based on our legitimate interest in ensuring smooth store operations. We keep this information only until your order has been collected.

## *VAT receipts*

If you request a VAT receipt in one of our stores, we must collect certain information to issue a VAT-compliant invoice. This may include:

- your company name and address,
- your VAT number, and
- your name and contact details

To keep our administration organized, we may also create a profile for you in our systems and link any future VAT receipts to this record.

We use this information to:

- issue your VAT receipt, as this is necessary to execute our agreement with you,
- meet our legal obligations under tax and accounting laws, and
- maintain accurate and efficient administrative records, based on our legitimate interest.

We store VAT receipt information for a period of ten years, as required by applicable tax and accounting regulations.

### 1.1.2. Camera Surveillance

#### *CCTV in our stores*

We use CCTV in and around our stores to ensure a safe and secure environment. When you visit our stores, we may record:

- your image,
- the area of the store captured by the camera, and
- the date and time of the recording

We use this information to:

- promote the safety of employees, suppliers, and customers/visitors, based on our legitimate interests.
- protect our property and prevent theft, vandalism, and other security-related incidents, based on our legitimate interests.
- assist in the identification, apprehension, and prosecution of offenders, and support investigations or complaint reviews to establish the truth, including when required by competent authorities in accordance with our legal obligations.

We store recordings only for as long as necessary for the purposes described above and in line with local legal requirements. In most cases, footage is automatically deleted after a short retention period, unless specific footage needs to be kept longer when required for the investigation of incidents or to comply with legal obligations.

Some of our stores have self-service checkouts. These areas are also monitored by CCTV to support safety and loss prevention. Recordings from self-service checkouts are processed in the same way and for the same purposes as described above.

## 1.2. Customer Service

### 1.2.1. Customer questions, requests and complaints

You can contact our Customer Service team through our website, by phone, via the Action app or on social media. Depending on how you contact us and what your question is about, we may process information such as:

- your name,
- your email address or telephone number,
- any details you share about your question, request or complaint.

We use this information to:

- respond to your question or request, as this is necessary to provide the service you requested or to execute our agreement with you,
- follow up on complaints or incidents based on our legitimate interest in resolving issues and improving our services,
- meet any legal obligations related to safety, incidents or consumer rights.

We store this information only for as long as necessary to handle your question, request or complaint and to meet our legal obligations. The exact retention period depends on the nature of your request and local legal requirements. Information related to incidents, damage or injuries may need to be kept for a longer period. After the applicable retention period ends, the information is deleted.

### 1.2.2. Call recording

If you call our Customer Service team, your call may be recorded. When this happens, you are always informed at the start of the call and have the option to decline. When a recording takes place, we may process:

- your telephone number,
- your audio recording of the call, and
- the information provided during the conversation.

We use this information to:

- monitor and improve the quality of our Customer Service and train our employees, based on our legitimate interest in maintaining a high service standard.

We store call recordings for a period of three months.

## 1.3. Online services

### 1.3.1. Visiting our website

When you visit our website, we use cookies and similar technologies to provide our online services and understand how they are used. Cookies are small information files that are saved on the device used (such as a computer, mobile phone or tablet) when visiting our website. Depending on your cookie choices, we may process:

- information about pages you view and actions you take,
- technical details about your device and browser, and
- your IP address or other online identifiers.

For more information about the types of cookies and similar technologies we use, please see our **Cookie Statement**.

We used this information to:

- provide the website and ensure its security, based on our legitimate interest or because it is necessary to provide the service,
- measure and improve performance of our website, when you given your consent, and
- show personalized content or offers, when you have given your consent.

You can withdraw your consent or change your cookie setting at any time through the **Cookie Banner**. You can also delete existing cookies and block new ones through your browser settings by using the following links:

- Chrome: <https://support.google.com/chrome/answer/95647?>
- Edge: <https://support.microsoft.com/en-us/help/10607/microsoft-edge-view-delete-browser-history>
- Firefox: <https://support.mozilla.org/en-US/kb/delete-browsing-search-download-history-firefox>
- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies#ie=ie-11>
- Opera: <http://www.opera.com/blogs/news/2015/08/how-to-manage-cookies-in-opera/>
- Safari (iOS): <https://support.apple.com/en-us/HT201265>
- Safari (macOS): <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Our website may contain links to third-party websites (for example, social media platforms). This Privacy Statement does not apply to those websites and we recommend reading their Privacy Statement.

### 1.3.2. Webshop orders

If you place an order in our webshop, we process the information necessary to complete your order and keep you informed on its progress. This includes:

- your name,
- your delivery and billing address,
- your email address and telephone number,
- the products you order, the amount and the date, and
- your chosen payment method.

Your payment details are also processed by our payment service provider (Adyen B.V.). This may involve:

- the transaction amount and date,
- limited card details (such as masked card number), and
- your device's IP address.

We use this information to:

- process your order, deliver your products and handle any returns or refunds, as this is necessary to execute our agreement with you.
- prevent and detect fraud or misuse, based on our legitimate interest in ensuring secure transactions, and
- comply with financial administration, tax and accounting obligations.

We store order and payment information for seven years to comply with tax and accounting regulations.

### 1.3.3. Action App

You can use the Action App to search for products, view weekly promotional products, locate your nearest store, and more. You can use the Action App whether or not you have signed up for a MyAction account.

#### **Technologies used in the Action App**

The Action App uses certain tracking technologies to ensure the app works properly and to give you the best experience. For example, these technologies help:

- keep the Action app secure and functioning correctly,
- enable features such as language, location (store finder), and saved lists,
- understand how the app is used so we can improve its performance.

Some technologies are strictly necessary for the app to work and are always active.

With your permission, we may also use technologies for:

- performance and analytics (to improve the app and fix issues),
- personalization (to tailor content to what you view, scan, or save),
- marketing (to show you relevant offers in the app or our other digital channels).

You can manage your choices regarding these technologies at any time in the App Settings. Your participation is voluntary, and the app will still function if you choose not to allow optional technologies.

#### 1.3.4. Customer Surveys

We invite customers to share feedback through short surveys to improve our products and services. Most surveys appear on our website or app and are shown only if you've accepted analytical cookies. Occasionally, we may also send survey invitations by email to customers who have opted in to receive marketing communications. We may process:

- your survey responses,
- if applicable, optional demographic data (e.g., age group, household size).

We do not request any information that directly identifies you and survey responses are analyzed in aggregated form only.

We use this information to:

- better understand customer needs and expectations and improve our services and products based on feedback, based on our legitimate interest.

Your participation is voluntary. We store this data only as long as needed to analyze the results and take improvement actions.

### 1.4. Communications

#### 1.4.1. Newsletter

If you subscribe to our newsletter, we will send you updates about our products, offers and trends. We personalize these emails based on the information you choose to share with us and how you interact with our messages.

If you sign up with only your email address, we process:

- your email address
- your name (optional),
- your date of birth (optional),
- your interactions with our emails (such as opening or clicking on messages),
- your interactions on our website or app (if you have consented to tracking).

If you also have a MyAction account, we also process:

- your purchase history (if you use your customer card when shopping)
- your webshop orders (if applicable)
- your saved favorites and shopping lists.

We use this information to:

- send you marketing communications tailored to your interests and preferences, based on your consent,
- address you personally when you provide your name, and
- send you birthday promotions, when you provide your date of birth.

You can withdraw your consent or unsubscribe from marketing emails at any time by using the link in our emails or by adjusting your marketing preferences in your account settings. Please note that processing your request may take up to two weeks.

We store your subscription details for as long as you are subscribed, or for up to one year after your last interaction with our marketing emails.

#### 1.4.2. Transactional emails

When you place an order, create a MyAction account, or when important information is needed to support your request, we may send you service-related emails. These messages provide essential information about the services you use and do not contain marketing content. These communications include, for example:

- order confirmations, delivery or return updates,
- account verification or password reset emails,
- important notices about changes to our Terms & Conditions.

We send these emails based on our legitimate interest in ensuring that you receive necessary and secure information related to your interactions with us.

These emails are necessary to provide our services, so you cannot unsubscribe from them. You may stop receiving transactional messages by completing your order or closing your account.

We keep records of these communications in line with applicable retention periods for your order or account.

### 1.4.3. Push notifications

You can choose to receive push notifications through our website, webshop or the Action app. These notifications may include updates about promotions and new products, or reminders related to your orders or favorites lists. You decide whether you want to receive push notifications through your device or browser settings.

We process the following information:

- a technical identifier for your device or browser (such as a device token),
- your device model, operating system and registration timestamp, and
- notification delivery and interaction information (for example, whether a notification has been opened).

We use this information to:

- send push notifications, based on your consent, and
- measure and improve the performance of our messages, based on our legitimate interest in communicating effectively.

The technical information is mainly stored to prove your registration and ensure that notifications are delivered correctly. We do not use this information to identify you directly unless you are logged in or have shared additional data with us. External providers who support us with notifications act on our instructions and are contractually required to protect your data.

If you have consented to receive personalized marketing communications, we may personalize push notifications based on your preferences and interactions.

You can disable push notifications at any time through your browser or device settings. If you withdraw your consent for personalized communications, push notifications will continue where relevant but without personalization.

We store this information for as long as you are registered to receive push notifications. In case of inactivity, we automatically delete it after one year.

#### 1.4.4. Promotional games and competitions

From time to time, Action organizes promotional games, prize-draws, challenges or competitions through our website, app or social media channels. Each promotion has its own terms and conditions explaining the rules and any specific data we process.

If you choose to participate, we may process:

- your contact details (for example, your email address or username)
- information needed to confirm eligibility and participation
- information required to deliver the prize (such as postal address)

We use this information to:

- run the promotion in line with the applicable terms and conditions
- ensure fair participation and prevent fraud
- contact winners and deliver prize.

Participation is always voluntary. We only keep personal data for as long as needed to manage the promotion and comply with legal requirements.

### 1.5. MyAction account

#### 1.5.1. Creating and managing your account

You can choose to create a MyAction account on our website or in the Action app. This allows you to make use of additional features such as saving favorites and accessing a digital customer card.

We process the following information:

- your name, email address, password and date of birth,
- information about your account preferences and settings, and
- technical information such as your registration date, last log-in date and log-in location based on your IP address.

If you give permission on your device, we may also process your premise location (e.g., via GPS or WPS) to help you find your nearest Action store.

We use this information to:

- create and manage your MyAction account,
- provide the features you choose to use, and
- keep your account secure.

This processing is necessary to perform the services you request from us as part of your MyAction account. We only process your precise location based on your consent on your device. Your date of birth is used to confirm eligibility for the MyAction program based on the minimum digital consent age in your country.

You can update your details or delete your account at any time in your account settings or by contacting Customer Service.

We store your MyAction account information for as long as your account is active. If your account has not been used for two years, we will contact you by email to ask whether you want to keep your account. If we do not receive a response, your account will be deactivated, and your personal data will be deleted.

### 1.5.2. Digital customer card

When you create a MyAction account you receive a digital customer card in the Action app. When you scan your card while shopping in our stores, we link your purchases to your account so that you can easily view your purchase history and access your digital receipts in the app.

If you are 18 or older, you can also participate in rewards and promotions linked to your customer card, such as scratch cards or spin-to-win campaigns.

We process the following information:

- your customer card number
- your purchase information, when you scan your card

We use this information to:

- link your in-store purchases to your MyAction account
- make your purchase history and digital receipts available in the app

as this is necessary to perform the services you request as part of your MyAction account.

You decide whether or not to scan your customer card. If your account is deleted or deactivated, your customer card and related data will also be removed. We store customer-card information while your MyAction account is active.

### 1.5.3. Product and store reviews

When you shop in our stores and scan your customer card, we may send you an email asking you to review a product you bought or the store you visited. We process:

- your email address (to send the request)

- your review content, including ratings, comments and date of submission,
- information about the product or store you reviewed,
- optional information you choose to provide, such as age or gender.

We work with trusted partners who help us collect and manage reviews.

We use this information to:

- ask for your review, based on our legitimate interest in understanding customer experience,
- improve our products and services, based on your consent when you choose to submit a review, and
- publish product reviews on our website, based on your explicit consent to do so, including whether it is shown anonymously or with a nickname of your choosing.

Store reviews are not published and are only used internally.

You can unsubscribe from the review requests at any time in your account preference center. You can withdraw your consent for processing your review by requesting its removal through our Customer Service.

#### 1.5.4. Insights and analytics

We may use the data associated with your MyAction account to carry our analyses at an aggregated level. These analyses focus on groups of users and general trends, not individual behavior. We process:

- information related to the use of your MyAction account and digital customer card, such as aggregated purchase data.

We use this information to:

- gain insights into shopping patterns and customer preferences at an aggregated level,
- improve our products, services, and store experience,
- support internal reporting and business analysis.

This processing is based on our legitimate interest in improving and developing our products and services.

We store aggregated and anonymized insights only for as long as needed to improve our services.

## 1.6. Online advertising & social media

### 1.6.1. Social media presence

You can follow Action on social media platforms to stay informed about our latest products, promotions and company news. These may include Facebook, Instagram, X (Twitter), TikTok, Pinterest, YouTube and LinkedIn.

When you visit our pages or interact with our posts (such as liking, sharing, or commenting), the social media platform is responsible for collecting and processing your personal data. This is carried out under the platform's own Terms & Conditions and Privacy Policy, which Action does not control.

If you contact us directly through social media (for example by sending us a private message), we will use the information you provide to respond to you, as explained in the *Customer Service* section of this Privacy Statement.

### 1.6.2. Social media advertising

When you sign up for our Newsletter or create an account, you can also choose whether Action may show you adverts on social media platforms, such as Facebook, Instagram, TikTok, Pinterest and Google.

If you give this consent, we will share a hashed (encrypted) version of your email address with these platforms. They compare this hashed email with the email address linked to your account on their platform and, if there is a match, may show you Action adverts. Platforms do not receive your email in plain text.

We process:

- your hashed email address

We use this information to:

- show you Action adverts that are more relevant to you, and
- avoid showing you adverts that are unlikely to interest you.

This processing is based on your consent for social media advertising. If you do not provide this consent, no matching will take place. You can withdraw your consent at any time through the Preference Center of your MyAction account.

### 1.6.3. Conversion measurement and audience matching technologies

We use privacy-focused marketing technologies to understand whether our advertising is effective. These technologies allow us to measure conversions (for example, when an

online ad leads to a visit to our website or a purchase) without using third-party cookies. We may process:

- your email address or phone number, in hashed form
- order or event data (for example, a purchase confirmation or newsletter sign-up)
- basic technical information (like timestamp or device type)

Before sharing, we hash this information so platforms like Meta or Google can only check whether it matches an account already known to them. They use this solely to:

- measure whether our advertising is relevant and effective,
- form aggregated groups of customers with similar interactions to improve relevance of our advertising.

Platforms do not receive your contact details in plain text and are not permitted to use this information for their marketing.

This processing is based on your consent for marketing cookies, which you can withdraw at any time through our cookie settings.

#### 1.6.4. Social listening

We use social listening tools to monitor publicly available online content that mentions Action or our products. This helps us understand customer perception and improve our products, services and communication. We only view information that you choose to make public on social media platforms. Private messages and content in closed groups are not accessed. We may process:

- your public username or profile name,
- public posts, comments, reviews or hashtags that mention Action,
- the date, time and platform of the content.

We use this information to:

- understand customer sentiment and brand reputation,
- identify issues or opportunities to improve our products or services.

Insights are viewed at an aggregated level. We may review individual public posts when necessary, if they appear to request assistance or raise an issue that may require follow-up. If so, we may respond through Action's official accounts.

This processing is based on our legitimate interest in understanding customer experience. If you do not want Action to review or continue using your public posts in our social listening activities, you can object at any time by contacting our Customer Service. We will

stop reviewing your content in this context and, where possible, remove past references linked to your identity.

### 1.6.5. User-generated content (UGC)

Customers sometimes share posts, photos, or videos featuring Action products on social media. If Action would like to reuse such content, we will always ask for your consent first. We may process:

- the content you shared (such as images, videos, or text),
- your social media username or handle,
- any other information visible in the content you choose to share.

We use this information to:

- feature Action products and customer experiences in our marketing communications, based on your consent.

You can withdraw your consent at any time by contacting us. We store your content only as long as needed for the campaign or activity you agreed to or until you withdraw your consent.

## 2. Children's data

Our services are not marketed towards children. If you wish to create a MyAction account, you must confirm that you are at or above the legal age of digital consent (between 13 and 16 years old, depending on your country). If you are below that age, you must confirm you have permission from your parent or legal guardian.

We do not knowingly process personal data from children who do not have such permission. If we become aware that we have done so unintentionally, we will delete the data as soon as possible.

If you believe a child has provided us with personal data without appropriate permission, please contact our Customer Service.

## 3. Security of your personal data

We take appropriate technical and organizational measures to protect your personal data against loss, misuse and unauthorized access. These measures include secure systems, access controls, and ongoing monitoring and testing of our security arrangements. Only

employees who need personal data to perform their job can access it, and only to the extent necessary.

When we work with trusted service providers to process personal data on our behalf, we require them to apply the same level of protection.

## **4. Who we share your personal data with**

We sometimes share your personal data with trusted third parties who help us provide our products and services. These include:

- other Action group companies that support our operations
- service providers such as marketing and communications partners, IT and hosting providers, payment and delivery partners, and customer service providers

These third parties may only process your personal data on our behalf and according to our instructions. We require them to protect your data with appropriate security measures and to comply with data protection laws at all times. We do not sell your personal data to third parties for their own marketing purposes.

We may also share personal data with public authorities, such as supervisory authorities, tax authorities or law enforcement, where we are legally required to do so.

## **5. International transfers of your personal data**

To provide our products and services, we work with trusted third-party providers that help us operate our business. We ask these providers to store and process personal data within the European Union (EU) or European Economic Area (EEA) wherever possible.

However, some providers are located outside the EU/EEA or may involve support teams in other countries. As a result, your personal data may be transferred internationally to places with different data protection laws.

When this happens, we make sure your data continues to be protected to European standards by applying safeguards recognized under data protection law. These include European Commission adequacy decisions, Standard Contractual Clauses, and, where relevant, participation in recognized data protection frameworks (such as the EU-US Data Privacy Framework), together with additional measures if required.

You can contact us if you would like more information about the safeguards we apply to international transfers.

## 6. Your data protection rights

You have certain rights regarding your personal data. You can exercise these rights by contacting our Customer Service team by using the details provided below. Depending on your request, we may need to verify your identity before responding.

You may ask us to:

- confirm whether we process your personal data and, if so, access that data (right of access)
- correct inaccurate or incomplete personal data (right to rectification)
- delete your personal data (right to erasure)
- transfer your personal data to your or another organization, where technically possible (right to data portability)
- restrict how we use your personal data (right to restriction of processing)
- withdraw your consent where we rely on your consent to process your personal data (right to withdraw consent)
- object to our processing of your personal data where we rely on legitimate interest (right to object)

To protect your data and confirm your identity, we may ask you for additional information to verify that the request is genuinely from you or to help us locate the data we hold about you, for example account details or technical identifiers associated with your device or browser.

We aim to respond to your request within one month. If the request is complex or we receive multiple requests, this period may be extended in line with applicable data protection law. We will inform you if this happens.

### ***How to contact us about your rights:***

To exercise any of your rights, please contact Action's Customer Service team:

#### **Action Customer Service**

Perenmarkt 15

1681 PG Zwaagdijk-Oost

Netherlands

Email: [klantenservice@action.nl](mailto:klantenservice@action.nl)

### ***Right to submit a complaint:***

If you are not satisfied with the way we handle your personal data, you can contact us so we can try to resolve your concerns. You also have the right to lodge a complaint with your

local data protection authority. A list of all national data protection authorities and their contact details is available here: [Our Members | European Data Protection Board](#)

## 7. Contact details

If you have any questions or concerns about this Privacy Statement or how Action handles personal data, please contact our Data Protection Officer:

**Action Data Protection Officer**

Perenmarkt 15

1681 PG Zwaagdijk-Oost

The Netherlands

Email: [privacy@action.nl](mailto:privacy@action.nl)

## 8. How we keep this information up-to-date

We may update this Privacy Statement when our services or legal requirements change. When we make significant changes, we will inform you in a suitable way. This Privacy Statement was last updated in February 2026.

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