

Privacy Statement Mani Bhadra - Phoenix Import

This is the privacy statement (hereinafter also referred to as the "Statement") of Mani Bhadra - Phoenix Import. In this Statement, we explain in a simple and understandable way who we are, what personal data we process about you, why we collect this data, and what we do with it. Personal data includes all information and collection of data that can directly or indirectly identify you, such as your first and last name, email address, date of birth, etc.

*We may change this Statement from time to time. The most current version of this Statement can always be found on our website: <https://www.phoeniximport.com/en/pages/privacy-and-cookie-statement>. We recommend consulting this Statement regularly to stay informed of any changes. **This Statement was last updated on: October 1, 2026.***

Who are we?

Mani Bhadra - Phoenix Import is an importer and wholesaler of spiritual and gift items. In this Statement, "we," "us," or "Mani Bhadra - Phoenix Import" refers to the controller of your personal data as defined in the GDPR. This refers to the entity affiliated with Mani Bhadra - Phoenix Import with which you have, have had, or will have a (business) relationship, or that otherwise determines which personal data is collected and how it is used.

Where this Statement refers to Mani Bhadra - Phoenix Import, it encompasses both the holding companies and operating companies within the organisation, namely:

Holding companies:

- Mani Bhadra Holding B.V. (Chamber of Commerce number: 08206282)
- Mani Bhadra Beheer II B.V. (Chamber of Commerce number: 76689913)

Operating companies:

- Mani Bhadra B.V. (Chamber of Commerce number: 05050712)
 - Mani Bhadra Italy B.V. (Chamber of Commerce number: 68770227)
 - Mani Bhadra France B.V. (Chamber of Commerce number: 68758340)
 - Mani Bhadra Germany B.V. (Chamber of Commerce number: 68758367)
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When does this Statement apply?

This Statement describes how we collect and use your personal data, for example, when you:

- Visit the website of Mani Bhadra - Phoenix Import.
- Use our social media channels.
- Purchase products from us.
- Subscribe to our newsletter.
- Supply goods and/or services to us.
- Apply for a position within Mani Bhadra - Phoenix Import; and/or

- Contact us for any reason.

This Statement applies to you only if we are considered the ‘controller’ of your personal data as defined in the General Data Protection Regulation (“GDPR”). This means that Mani Bhadra - Phoenix Import determines the purpose (the why) and the means (the how) of processing your personal data.

Which personal data do we process, and why?

1. Personal data of customers who purchase products from Mani Bhadra - Phoenix Import Personal data refers to data that can directly or indirectly be traced back to an individual. Business data, such as company names, addresses, and payment details, are generally not considered personal data. However, this changes when such data can be traced back to a physical person, for example, in the case of a small business such as a sole proprietorship or freelancer, where information can be directly linked to an individual. If this data cannot be traced back to an individual, it is not considered personal data, and this Statement does not apply.

1.1. Creating an account

Customers are required to create an account on the Mani Bhadra - Phoenix Import website to place any orders. When you create an account on our website, we may process the following data:

Categories of personal data	Examples
a) Contact details	First name, last name, email address, phone number
b) Company details	Company name, Chamber of Commerce, VAT, or similar number (if applicable), website
c) Address details	Street, house number (+ addition if applicable), postal code, city, country
d) Account details	Username (email address), password

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a), b), c), d)	Creating and managing your account	Necessary for the performance of the agreement between you and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR
a), b), c), d)	Communication regarding orders and returns	Necessary for the performance of the agreement between you and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR
a), d)	Communication about your account and account management	Necessary for the performance of the agreement between you and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR

1.2. Purchasing products

When you purchase products from Mani Bhadra - Phoenix Import, we process additional personal data necessary for processing and handling your orders:

Categories of personal data	Examples
a) Order information	Purchase history, ordered products, payment status
b) Payment details	Bank account number, invoice address, payment method
c) Shipping information	Delivery address (if different), delivery instructions

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a), b), c)	Processing and handling your order, including shipping and payment	Necessary for the performance of the agreement between you and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR
a), b), c)	Maintaining our financial records	Necessary to comply with legal obligations under Article 52, paragraph 4 AWR; Article 6(1)(c) GDPR

1.3. Sending our newsletter

If you subscribe to our newsletter, we process personal data for sending news and product information:

Categories of personal data	Examples
a) Contact details	Email address

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a)	Sending newsletters and product information (if you have subscribed)	Legitimate interest of Mani Bhadra - Phoenix Import to contact existing customers for direct marketing; Article 6(1)(f) GDPR

If the processing of personal data is based on your consent, you have the right to withdraw this consent at any time. If you no longer wish to receive our newsletter, you can easily unsubscribe via the “unsubscribe” button at the bottom of the newsletter or by sending an email to info@phoeniximport.nl. Please note that it may take a few days before your data is permanently removed from our systems.

2. Personal data of employees of our customers

When you are employed by an organization that is a customer of Mani Bhadra - Phoenix Import, we may collect the following personal data:

Categories of personal data	Examples
a) Contact details	First name, last name, (business) email address, phone number

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a)	Maintaining contact about orders and business agreements	Necessary for the performance of the agreement between the customer and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR

3. Personal data of employees of our suppliers

If you, as an employee of a supplier, deliver products and/or services to Mani Bhadra - Phoenix Import, or if you operate as a freelancer or small business owner, and the data can directly or indirectly be traced back to a physical person, we may collect the following personal data:

Categories of personal data	Examples
a) Contact details	First name, last name, (business) email address, phone number
b) Company details	Company name, Chamber of Commerce, VAT, or similar number (if applicable), website
c) Payment details	Bank account number, invoice address

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a), b)	Verifying the identity of suppliers and communicating regarding procurement of products and services	Necessary for the performance of the agreement between the supplier and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR
b), c)	Processing and handling payments	Necessary for the performance of the agreement between the supplier and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR
b), c)	Maintaining our financial records	Necessary to comply with legal obligations under Article 52, paragraph 4 AWR; Article 6(1)(c) GDPR

4. Personal data of applicants

If you are applying or have applied for a position within Mani Bhadra - Phoenix Import, we may collect the following personal data:

Categories of personal data	Examples
a) Contact details	First and last name, address, phone numbers, email addresses, date of birth, nationality, gender
b) Data relevant to the position applied for	Curriculum Vitae (CV), application letter, references, results of competency tests

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a)	Verifying the identity of the applicant and establishing contact in connection with the application process	Necessary for the performance of the agreement between the applicant and Mani Bhadra - Phoenix Import; Article 6(1)(b) GDPR
b)	Assessing the suitability of the applicant for the open position	Legitimate interest of Mani Bhadra - Phoenix Import to determine whether the applicant is suitable for the vacancy; Article 6(1)(f) GDPR

5. Personal data of individuals contacting us

If you do not fall under any of the above categories but contact us, for example, via the chat function on our website, email, phone, or one of our social media channels, we may collect the following personal data:

Categories of personal data	Examples
a) Personal identification data	First name, last name
b) Contact details	Email address, phone number
c) Communication data	Content of emails, chat messages, or other information you share with us

Purposes and legal basis for processing the above categories of personal data:

Categories	Purpose	Legal basis
a), b), c)	Maintaining contact and communicating about questions or other information	Legitimate interest of Mani Bhadra - Phoenix Import to communicate with individuals who contact us; Article 6(1)(f) GDPR

What choices do you have on social media?

Mani Bhadra - Phoenix Import is active on social media platforms such as Facebook and Instagram.

Through our social media pages, we receive statistics about visitors. Although Mani Bhadra - Phoenix Import and the social media platforms are jointly responsible for these statistics, the respective social media provider is your primary contact for exercising your rights and filing any complaints. We will support the social media provider where necessary in responding to your requests or complaints.

For more information about the personal data, we receive from social media providers and how you can adjust your settings, please refer to the websites and privacy statements of the respective social media platforms.

Cookies

When you visit or use our website, information is automatically collected and sent to us by your computer, mobile phone, or other devices. We use different types of cookies and similar technologies on our website, including functional cookies, statistical cookies, and marketing/tracking cookies.

In some cases, cookies may contain personal data, such as a unique ID linked to your device, IP address, or, when you are logged in, information traceable to your account. Marketing and tracking cookies can process personal data, for example, to show targeted advertisements and analyse user behaviour. For these cookies, we request your explicit consent.

When you first visit our website, a pop-up will appear where you can set your cookies preferences. By clicking "OK," you consent to our use of cookies. You can withdraw or adjust your consent at any time.

For more information about our use of cookies and similar technologies, you can consult the Cookies banner available on our website. Here, you can also manage your preferences and enable or disable cookies via your browser settings. Please note that disabling cookies may affect the functionality of the website.

Google Analytics

We use Google Analytics 4 to gain insight into how our website is used and to improve our services. Google Analytics is a web analytics service provided by Google LLC (Google), headquartered in the United States.

Google Analytics 4 uses IP anonymisation, which means the last octet of the IP address of users is removed before it is sent to Google servers. This ensures that the collected data cannot be used to identify individual visitors.

We do not use Google Signals or User IDs within Google Analytics 4. This means no user profiles are created based on Google accounts or login credentials from our website, and data is not linked across sessions or devices. Furthermore, we use Google Analytics solely for analytical purposes. The collected data is not used for personalised advertisements or other commercial purposes.

The data we collect is limited to the standard information collected by Google Analytics, such as:

- Location (based on an anonymized IP address).

- Latitude and longitude of the location (to the extent anonymised).
- Browser version and sub-version.
- User agent string of the browser.
- Brand, model, and type of device.
- Sub-version of the operating system; and
- Screen resolution.

The data may be transmitted to Google servers outside Europe, including the United States. Google is affiliated with the EU-U.S. Data Privacy Framework and uses the European Commission's adequacy decision for transferring personal data to the U.S. To provide additional privacy protection, Google has also implemented standard contractual clauses and technical safeguards. For more information, please refer to [Google's privacy policy](#).

If you do not want Google Analytics to analyse your usage data, you can install the Google Analytics [Opt-out Add-on](#) in your browser. This prevents Google Analytics from collecting information about your website visits.

Integration of the Trusted Shops Trustbadge

Trusted Shops widgets are integrated into this website to display Trusted Shops services (e.g., Trustmark, collected reviews) and offer Trusted Shops products to shoppers after they place an order.

This is done to protect our legitimate interests in optimal marketing by enabling safe shopping in accordance with Article 6(1)(f) GDPR. The Trustbadge and the services advertised with it are an offer from Trusted Shops SE, Subbelrather Str. 15C, 50823 Cologne ("Trusted Shops"), with whom we share joint responsibility for data protection under Article 26 GDPR. In this data protection statement, we inform you below about the essential content of the agreement in accordance with Article 26(2) GDPR.

Under the joint responsibility between us and Trusted Shops SE, you can contact Trusted Shops regarding data protection questions and the exercise of your rights using the contact options specified in the Trusted Shops [data protection information](#). However, you can also contact the responsible person of your choice at any time. Your query will then, if necessary, be forwarded to the other person responsible for an answer.

Data processing during the integration of the Trustbadge/other widgets

The Trustbadge is provided by a U.S. content delivery network (CDN) provider.

An adequate level of data protection is ensured by an adequacy decision of the EU Commission, which can be accessed [here](#) for the U.S. Service providers from the U.S. are generally certified under the EU-U.S. Data Privacy Framework (DPF). More information is available [here](#). If service providers are not certified under the DPF, standard contractual clauses have been concluded as an appropriate safeguard.

When the Trustbadge is accessed, the web server automatically saves a so-called server log file, which also contains your IP address, the date and time of the access, the amount of data transferred,

and the requesting provider (access data), and documents the access. The IP address is immediately anonymised after collection so that the stored data cannot be assigned to you personally. The anonymised data is primarily used for statistical purposes and for error analysis.

Processing of data after the completion of the order

After completing the order, order data (total order amount, order number, purchased product, if applicable) and your email address, hashed using a cryptographic one-way function, are transmitted to Trusted Shops.

The legal basis is Article 6(1)(f) GDPR. This is necessary for the verification of whether you are already registered for Trusted Shops services and is therefore necessary to safeguard our and Trusted Shops' overriding legitimate interests in the buyer protection linked to the specific order and transaction evaluation services under Article 6(1)(f) GDPR. If you are already registered, further processing takes place in accordance with the contractual agreement between you and Trusted Shops. If you have not yet registered for the services, you will be given the opportunity to do so for the first time. Further processing after registration is also subject to the contractual agreement with Trusted Shops.

If you do not register, all transmitted data will automatically be deleted by Trusted Shops, and a personal reference will no longer be possible.

Trusted Shops uses service providers for hosting, monitoring, and logging. The legal basis is Article 6(1)(f) GDPR to ensure a trouble-free operation. Processing may take place in third countries (U.S. and Israel).

An adequate level of data protection is ensured by an adequacy decision of the EU Commission, which can be accessed [here](#) for the U.S. and [here](#) for Israel. Service providers from the U.S. are generally certified under the EU-U.S. Data Privacy Framework (DPF). More information is available [here](#). If service providers are not certified under the DPF, standard contractual clauses have been concluded as an appropriate safeguard.

Data processing by Mondu

When you select a Mondu payment method, your data will be processed by Mondu as an independent data controller. Mondu processes your data to conduct identity and credit checks, assess payment eligibility, process payments, and fulfil its contractual obligations.

For detailed information about how Mondu processes your data, which Mondu entity processes your data, the purposes of processing, data recipients, retention periods, and your data protection rights, please review [Mondu's Privacy Information for Buyers](#).

Do we use automated decision-making?

We do not make decisions based solely on automated processing, including profiling, that have legal or other significant consequences for you. This refers to decisions made entirely by computer programs or systems without any human intervention from our employees.

If you choose a Mondu payment method at checkout, Mondu carries out an automated check of your identity, fraud risk and creditworthiness. Based on this check, Mondu may decide not to offer you this payment method. This decision is made by Mondu as an independent data controller, not by Mani Bhadra - Phoenix Import. For more information, see "Data processing by Mondu".

With whom do we share personal data?

We do not sell your personal data to third parties. Nor do we share your personal data, except with your consent, when legally required, or in a limited number of cases described below.

To achieve the purposes mentioned in this Statement, we may share your personal data with the following entities:

- Distribution and logistics partners: To process, deliver, and return orders, we may share your address and contact information with our distribution and logistics partners. These partners process your data exclusively for product delivery and follow our instructions.
- External service providers: Mani Bhadra - Phoenix Import uses reliable external service providers for certain processing activities, such as hosting our website, IT management, the chatbot on our website, payment processing, and marketing services. These parties process your data solely on our behalf and in accordance with our instructions.
- Payment partners acting as independent controllers: If you choose a Mondu payment method at checkout, we share the data required for the payment and the credit check with Mondu, such as your name, company details, email address, billing and delivery address, and the details of your order and invoice. Mondu processes this data as an independent data controller and not on our behalf. For more information, see "Data processing by Mondu".
- Professional advisors: Your personal data may be shared with professional advisors, such as accountants, lawyers, banks, and insurance companies, when necessary to support our business activities or to fulfil legal, administrative, or tax obligations.
- Other parties in business transactions: Occasionally, your personal data may be shared during business transactions such as the sale of parts of our business or in reorganisations, mergers, joint ventures, or other forms of acquisition of our business, assets, or shares, including in the event of bankruptcy or similar proceedings.

If we share personal data with a third party, we enter into a (processing) agreement, where necessary, to ensure that this third party complies with the requirements of the General Data Protection Regulation (GDPR) and processes your data in a secure and responsible manner.

How long do we retain personal data?

We retain your personal data for as long as necessary for the purposes for which we process it, unless a longer retention period is required by law. Refer to the section "Which personal data do we process, and why?" for more information on specific processing purposes.

Our retention periods are determined based on the following criteria:

- Necessity for service or operations: How long are the data needed to provide our services or support the operations of Mani Bhadra - Phoenix Import?
- Account information: Data you provided for creating an account is retained as long as your account remains active. If your account has been inactive for 12 months, you will receive an email asking whether you wish to retain or delete your account. Without a response within two weeks, the account will be deleted, except for data we are legally required to retain.

- Order information: Data about your orders is retained for the duration of the customer relationship and up to five years after the last transaction, unless a longer period is required for tax or accounting obligations.
- Applicants: We retain applicant data for up to four weeks after the end of the application process, unless you join our company or give consent to retain your data for future vacancies.
- Legal and contractual obligations: In some cases, we are required to retain data longer, for example, based on legislation, government requests related to investigations, or to support legal proceedings or protect against potential claims. In such cases, data are retained for the required period, for example, up to seven years for tax administration.

Once the relevant retention period expires, your personal data will be deleted or anonymised, so they are no longer traceable to an individual.

Do we transfer personal data outside the EEA?

In principle, we process all your personal data within the European Union and work exclusively with parties that comply with this requirement. However, in exceptional cases, it may happen that we need to transfer personal data to a 'third' country outside the European Economic Area (EEA).

Should such a situation arise, and your personal data are transferred to a country with a lower level of protection than the GDPR, we will take appropriate measures to securely transfer your personal data. This may include the use of standard contractual clauses approved by the European Commission.

What security measures do we apply?

To protect your personal data, we take appropriate measures in accordance with applicable data protection laws. This also includes requiring our service providers to take measures to ensure the confidentiality and security of your data.

Although no system for data transmission or storage can guarantee complete security, we strive to prevent risks such as destruction, loss, alteration, unauthorised disclosure, or access through technical and organisational measures. These measures are chosen based on:

- The state of technology.
- Implementation costs.
- The nature of the data we protect.

If you have any reason to believe that your interaction with us or your data is no longer being treated securely, please contact us immediately.

What are your rights regarding your personal data?

You have the right to request access to your personal data (including a copy), correct or delete it, restrict its processing, object to the processing, and request the transfer of the personal data you provided. For this, please contact us using the contact details below.

We will do our best to process your request free of charge and within a reasonable time frame unless it requires disproportionate effort. To prevent misuse, we may ask you to sufficiently identify yourself before processing your request. In certain cases, we may not be able to fully comply with your request, for example, due to statutory retention periods. If this is the case, we will inform you. We generally respond within one month of receiving your request.

Do you have questions, comments, or complaints?

If you have questions, comments, or complaints regarding this Statement, we are happy to assist you. You can reach us via email or phone using the contact details below. Additionally, you have the right to file a complaint with the Dutch Data Protection Authority or, if you reside or work in another country, with the relevant privacy regulator in that country.

Contact

For questions or requests regarding the protection of your personal data, or about this Statement in general, you can contact us at:

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