



Privacy Statement - Privacy Valley BV

1. INTRODUCTION

Privacy Valley B.V. (Privacy Valley) is committed to your privacy and keeping your personal data safe. We are bound by the General Data Protection Regulation (GDPR) and will protect your personal information in accordance with the principles set out therein. This privacy statement aims to give you a clear view of what personal data we collect and how we use it, our dedication to protecting it and your rights and options to control your personal information and protect your privacy.

In this policy, "we," "us," and "our" means Privacy Valley B.V. (trading as Privacy Valley), a company registered in the Netherlands at Keizersgracht 630, 1017 ER, Amsterdam and "you" means the individual to whom the information relates.

2. WHEN DOES THIS PRIVACY STATEMENT APPLY?

This Privacy Statement is applicable to all Processing of all personal data, by us or on behalf of us, of our (prospective) customers, suppliers and business partners and other individuals. This Privacy Statement does not address the processing of personal data of Privacy Valley employees.

We consider all information that relates to you and identifies you personally, either alone or in combination with other information available to us as personal data.

3. WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT?

We collect your personal data through a variety of sources, such as when you procure our software or services, sign up for our newsletter or simply browse our websites.

- **Name, contact details and other identifying information**
When you use our software or advisory services we may record the following data: your name, title, function, contact details including your address, telephone number and email address.
- **Your personal account or registration details**
When you create a personal account for accessing our software, we may record your sign-in details, name, and other information you enter on your personal account or registration form or information we gather from your device.
- **Information about your visits to our websites or other digital media**
When you visit our website, we may register your IP address, browser type, operating system, referring website web-browsing behaviour.
- **Your communication with us**
When you send us an email or chat with us online or communicate with us via online apps such as Skype for Business or GoToMeeting, we register your written communication with us. We may register your questions or complaints in our database.
- **Information you choose to share with us**
You may choose to share information with us, for example when you leave a comment for us on Twitter or LinkedIn or fill out a customer survey via our website.

We also collect personal data through cookies and similar technologies. Cookies are small files of information stored on your equipment which save and retrieve information about your visit to this website – for example, how you entered our site, date and time of visit, location information, IP addresses, how you navigated through the site, and what information was of interest to you.

Read more about how we use cookies via www.privacyvalley.nl/cookies.

4. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Privacy Valley is responsible for the processing of all personal data that fall within the scope of this Privacy Statement. Privacy Valley may share your personal data with third parties, but if it does so, it will remain responsible for your personal data.



5. FOR WHAT PURPOSES DO WE USE YOUR PERSONAL DATA?

We may use your data for various purposes, all of which have been set-out below. Each purpose for which we process personal data must have a legal basis in the law. These legal bases are listed with the descriptions of the purposes for processing below.

Some information we collect based on your consent. If you do not allow us to collect all the information we request, we may not be able to deliver all our products and services effectively.

5.1 To provide you with our products and services

The main reason we, and any of our service providers on behalf of us, collect, use, hold and disclose personal information is to provide you with the products and services that you have purchased from us. This includes personal data that directly relate to the fulfilment of our software and advisory services and are required to:

- grant you access to use our privacy management software;
- provide you our privacy advisory services or customer services;
- facilitate invoicing and obtain payment;
- communicate with you (e.g. e-mail, Skype for Business, GoToMeeting);
- conduct statistical research about our software and services (e.g customer satisfaction and new features);
- register complaints.

Legal basis for processing this data: If you have procured our software or services, we will use personal information to perform the contract you have with us or answer your questions and provide you with the best service possible.

5.2 To send you our newsletter

When you sign up for our newsletter we will send you regular updates on the products and services of Privacy Valley which may be relevant for you. You have the right to unsubscribe at any time from our newsletter by using the "unsubscribe" button at the bottom of each newsletter.

Legal basis for processing this data: We process this personal information based on your consent if you have subscribed to our newsletter, or for our legitimate business purposes to communicate with our existing customers about our products and services.

5.3 To send you personalised marketing messages

When you have visited our website, signed up for our newsletter or shared your contact details with us during an event, we may send direct marketing communications to you using email or social media. We ask for your consent, where required by applicable law to send our personalised marketing communications.

Legal basis for processing this data: We process this personal information for our legitimate business purposes, to send you relevant information about our products and services, events and news that might be of interest to you.

5.4 For the development and improvement of our products and services

We use aggregated personal data to analyse customer behaviour and to adjust our products and services accordingly to ensure that it is relevant to our customers. We may also process your personal data to compile analytics reports. This means that we analyse how often you read our newsletters, how often you visit our website or apps, which pages you click on and what goods you view through our website or apps to understand which products and services you like. We also test the level of satisfaction of our customers, using surveys. We use your responses to such surveys for quality assessments and to improve your customer experience.

Legal basis for processing this data: We process this personal information for our **legitimate business purposes**, which includes the ability to enhance, modify, personalise or otherwise improve our services and communications towards our customers, to better



understand how people interact directly with us (through our communications or our websites) and determine the effectiveness of promotional campaigns or advertising.

5.5 To comply with the law

We process your personal data to comply with laws and regulations. We may for example have to gather and disclose personal data where tax or business conduct related obligations apply and disclose your personal data to government institutions or supervisory authorities.

Legal basis for processing this data: We process this personal information based on a **legal obligation** to gather and disclose such personal information.

5.6 When you interact with Privacy Valley directly

If you contact our Customer Service (or vice versa), we will use personal information such as your order information and contact history to process your request and provide you with the best service possible.

Legal basis for processing this data: We will process your personal information in this way if it is **necessary for the performance of a contract** with Privacy Valley or if it is required for us to **comply with any legal obligations**.

5.7 For the assessment and acceptance of a business partner

When a prospective business partner gets in contact with us, we may process your personal data for assessment and acceptance purposes, for example to confirm and verify your identity and screening against publicly available government registers.

5.8 For the conclusion and execution of agreements with business partners

We process your personal data for administrative purposes such as sending invoices and making payments. We also use your personal data to deliver or receive and administer our or your products or services. Privacy Valley will process your personal data to further execute our agreement, including for the delivery of customer services.

5.9 For business process execution

We process your personal data in the performance and organisation of our business. This includes general management, order management and management of Privacy Valley's assets. Privacy Valley also processes your personal data for its internal management. We conduct periodic audits, implement business controls, and manage and use customer, supplier and business partner directories. Also, we process your personal data for finance and accounting, archiving and insurance purposes, legal and business consulting and in the context of dispute resolution.

5.10 To monitor compliance

Privacy Valley monitors its IT systems to check compliance with Privacy Valley's internal policies and regulations. During monitoring activities, your personal data may be accessed and viewed.

6. WHO HAS ACCESS TO YOUR PERSONAL DATA?

6.1 Access to your personal data within Privacy Valley

Privacy Valley employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform their jobs.

6.2 Access to your personal data by third parties

The following third parties may have access to your personal data, where relevant, for the provisioning of their products or services to Privacy Valley or to you:



- banks payment system operators and credit card companies, for the fulfilment of payments, as identified while you undertake your payment;
- technology service providers such as those providing our privacy management software as well as our office automation, IT suppliers hosting our crm database and websites;
- parties who support Privacy Valley in their marketing activities, such as digital agencies, mailing houses, statistical research partners, and Google;
- authorised representatives who sell products and services on our behalf as identified by the party you buy the products and services from;
- debt collectors;
- regulatory bodies, government agencies and law enforcement bodies;
- our financial advisors, legal advisors and auditors; and
- other third parties with whom we are required by law to share the personal data.

We may also disclose your personal information to other third parties where:

- you have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted or legally required to disclose the information.

6.3 Transfer outside the EU

In general, we store and process your personal information solely in the European Union. There might, however, be extraordinary occasions when we need to transfer your personal information outside of the European Economic Area ("EEA") to a country is not regarded under European Law as providing the same level of data protection as the country in which you normally use our services.

In these circumstances we will take appropriate steps to ensure that your personal information is adequately protected. Typically, such steps include carrying out data security reviews of any recipients and putting in place contracts with such recipients to ensure they employ the same or similar appropriate technical and organisational measures as Privacy Valley, so your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the contact details below.

6.4 The use of your personal data by data processors

When a third party processes your personal data for or on behalf of Privacy Valley we will enter into an agreement with such third party to agree on appropriate conditions subject to which the processing of personal data is allowed. In this agreement we include obligations to ensure that your personal data are processed by the data processor solely to provide services to us.

7. HOW IS YOUR PERSONAL DATA SECURED?

Privacy Valley has taken adequate safeguards to ensure the confidentiality and security of your personal data. We have implemented appropriate technical, physical and organisational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing. Examples are access restrictions, password policies and secure cloud servers.

8. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

9. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

At any time, you have the right to:

- request access to or a copy of any personal data which we hold about you;



- rectification of your personal data, if you consider that the information we are holding is inaccurate;
- ask us to delete your personal data, if you consider that we do not have the right to hold it;
- withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- ask us to stop or start sending you marketing messages as described above in the marketing section;
- restrict processing of your personal data;
- data portability (moving some of your personal data elsewhere) in certain circumstances;
- object to your personal data being processed in certain circumstances; and
- not be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

If you wish to exercise these rights or you have any questions regarding the processing of your personal data please send us an e-mail to: feedback@privacyvalley.com, or write to us at: Privacy Valley, Keizersgracht 630, 1017 ER, Amsterdam.

We are very committed to working with you to always obtain a fair resolution of any complaint or concern you might have in relation to our processing of your personal data. If however, you feel that we have not been able to assist you adequately and do not comply with applicable privacy rules you have the right to lodge a complaint with the data protection authority using their website: <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap>.

This Privacy Statement was last amended on **01 December 2018**.