

(1. / 22-02-2023)

### **Introduction**

In the context of our services, we process personal data. We may have received this information from you, for example via our website, e-mail, telephone or app. In addition, we may obtain your personal data in the context of our services from third parties (for example, your employer). With this privacy statement we inform you about how we handle this personal data.

### **Personal data to be processed**

The personal data we process depends on the relevant service and circumstances. The following data are concerned:

- Name and address details;
- Function contacts;
- Date and place of birth;
- Gender;
- Contact details (e-mail addresses, telephone numbers) and name and function of contacts;
- Copy of identity documents;
- Citizen service number (only if necessary!);
- Passport photo (only if strictly necessary! For example, for personnel file);
- Age;
- Salary and other data required for tax returns, salary calculations, etc.;
- Marital status, partner details and possibly information about children; to the extent necessary for, for example, tax returns);
- Bank account number;
- Information about your activities on our website, IP address, internet browser and device type.

### **Purposes of and grounds of processing**

In a number of cases we process the personal data in order to comply with a legal obligation, but we usually do this in order to be able to implement our services. Some data is recorded for practical or efficiency reasons, which we (may) assume are also in your interest, such as:

- Communication and information provision;
- Being able to provide our services in the most efficient way possible;
- The improvement of our services;
- Billing and collection

In concrete terms, the above means that we use your personal data for marketing purposes or to send you advertising materials or messages about our services, if we think they may be of interest to you. We may also contact you to request feedback on services provided by us or for market or other research purposes.

In some cases, it may be that we want to process personal data for reasons other than the above and that we will explicitly ask you for permission to do so. If we ever want to process personal data that we may process on the basis of your consent for other or more purposes, we will first ask you for permission again.

Finally, we may also use your personal data to protect the rights or property of ourselves and those of our users and, if necessary, to comply with legal proceedings.

### **Provision to third parties**

In the context of our services, we may use services from third parties, for example if these third parties have specialist knowledge or resources that we do not have in-house. These can be so-called processors or sub-processors, who will process the personal data on the basis of your exact assignment. Other third parties who, although strictly speaking not processors of the personal data, have or may have access to it, are, for example, our system administrator, suppliers or hosting parties of online software, or advisors whose advice we seek regarding your assignment. If the use of third parties results in them having access to the personal data or that they themselves record and/or otherwise edit, we will agree with those third parties (in writing) that they will comply with all obligations of the GDPR. Of course, we will only engage third parties who we can and may assume are reliable parties who handle personal data adequately and, incidentally, can and will comply with the GDPR. This means, among other things, that these third parties may only process your personal data for the aforementioned purposes.

Of course, it may also be the case that we have to provide your personal data to third parties in connection with a legal obligation.

Under no circumstances will we provide your personal data to third parties for commercial or charitable purposes without your explicit consent.

### **Retention periods**

We will not process your personal data for longer than is not necessary for the purpose for which they were provided (see the section '*Purposes of and bases for the processing*' ). This means that your personal data will be kept for as long as it is necessary to achieve the relevant goals. Certain data must be kept longer (often 7 years), because we must comply with legal retention obligations (for example the tax retention obligation) or in connection with regulations from our professional association.

### **Security**

We have taken appropriate organizational and technical measures for the protection of personal data insofar as they can reasonably be required of us, taking into account the interest to be protected, the state of the art and the costs of the relevant security measures.

We oblige our employees and possibly third parties who necessarily have access to personal data to maintain confidentiality. Furthermore, we ensure that our employees have received correct and complete instruction about the handling of personal data and that they are sufficiently familiar with the responsibilities and obligations

of the GDPR. If you would like to know this, we would like to inform you further about how we have designed the protection of personal data.

### **Your rights**

You have the right to inspect, rectify or delete the personal data that we hold about you (except of course if this interferes with any legal obligations). You can also object to the processing of your personal data (or part thereof) by us or by one of our processors. You also have the right to have the data provided by you transferred by us to yourself or directly to another party if you wish.

### **Incidents with personal data**

If there is an incident (a so-called data breach) regarding the personal data concerned, we will inform you immediately, subject to serious reasons, if there is a concrete chance of negative consequences for your privacy and the realization thereof. We strive to do this within 48 hours after we have discovered this data breach or have been informed about it by our (sub)processors.

### **Complaints**

If you have a complaint about the processing of your personal data, we ask you to contact us about this. If this does not lead to a satisfactory outcome, you always have the right to file a complaint with the Personal Data Authority; the supervisory authority in the field of privacy.

### **Processing within the EEA**

We will only process the personal data within the European Economic Area, unless you agree with us on other written agreements. An exception to this are situations in which we want to map contact moments via our website and/or social media pages (such as Facebook and LinkedIn). Think, for example, of visitor numbers and requested web pages. Your data will be stored by third parties outside the EU when using Google Analytics, LinkedIn or Facebook. These parties are 'EU-US Privacy Shield' certified, so they must comply with European privacy regulations. Incidentally, this only concerns a limited number of sensitive personal data, in particular your IP address.

### **Alterations**

Undoubtedly, our privacy policy will be changed from time to time. The most recent version of the privacy statement is logically the applicable version and can be found on our website.

### **Finally**

With this privacy statement we hope to have given you a clear picture of our privacy policy. However, if you have any questions about how we handle personal data, please let us know. The first point of contact for privacy aspects at our organization is *<name, possibly e-mail address and / or telephone number>*).

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