

Privacy Statement Hilverda De Boer

Most recently updated in March 2019

Safeguarding the privacy and confidentiality of information entrusted to Hilverda De Boer is very important to them. That is why Hilverda De Boer endeavours to safeguard the protection and the correct use of the information that identifies you or makes you identifiable.

By means of this privacy statement, Hilverda De Boer informs website users and users of the services provided by Hilverda De Boer of the way in which Hilverda De Boer uses personal data. This privacy statement explains how we collect, use, share and protect personal data.

1. Collecting and using personal data

1.1 What kind of information do we collect?

If you use the services of Hilverda De Boer, we need to process certain data. Indeed, we need this data in order to conclude the agreement but also to be able to provide our services and for the financial settlement of the agreement. In certain cases, this is personal data. Among other things, we may process the following categories of personal data:

- your name, address and other contact details such as your telephone number and email address;
- your gender;
- your bank account number;
- notes from our contact with you as a customer.

If you do not wish to provide us with the personal data necessary for the performance of the agreement, we will be unable to guarantee the correct performance of that agreement. If the processing of specific personal data is obligatory by law, we will inform you accordingly.

1.2 The legal bases for processing your personal data

As mentioned before, Hilverda De Boer only collects the personal data that is needed in order to be able to meet your request as a customer or a visitor.

Privacy legislation, including the General Data Protection Regulation (GDPR) allows us to process personal data if this is done on the basis of one of the principles set out in the GDPR. If we process your personal data, the processing is based on one of the following principles:

- Your personal data may be processed if such is necessary for the performance of an agreement with you or to the extent necessary in the run-up to concluding an agreement.
- Your personal data must be processed in order to meet statutory obligations.
- You have given your specific and explicit consent to process your personal data for a certain purpose. If you do not give your consent for the processing of your personal data, it will not affect the service we provide to you. If you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

1.3 For which purposes do we process your personal data?

We collect and process personal data for various purposes. For instance:

- a. General contact
The data is used for (i) providing the information you have asked for, (ii) general contact with you about a potential agreement or an existing agreement, and (iii) answering and/or dealing with questions and/or complaints.
- b. The performance of an agreement
We process your personal data for the agreement or agreements you conclude, will conclude or have concluded with us. This enables us to provide our services and/or to deliver our products.
- c. Customer account
Your personal data is processed in order to create a customer account. You can make use of our services via the customer account. Your login details for the customer account are used to secure your account on the website.
- d. Direct marketing
If give us your consent, we may use your personal data to send you newsletters and, possibly, invitations. We use direct marketing to send you information about our services or events.
- e. Statutory obligation
We may process your personal data and disclose it to third parties if we are obliged to do so by virtue of the law or legislation. Examples include filing a tax return,
- f. accounts receivable management and the collection of debts with regard to our debtors
Among other things, we process personal data to (i) send out bills, reminders and demands to debtors in order to collect debts; (ii) to make a telephone call to remind debtors of an outstanding claim and (iii) to have a debt collected by a debt-collection agency, as appropriate.
- g. As a defence against legal claims
We may process your personal data (or have it processed) in order to (be able to) defend ourselves against any legal claims.

1.4 The automatic collection of personal data

Hilverda De Boer uses technology for the automatic collection of certain kinds of data when you use our online services. Processing this data enables us to improve the operation, usability and effectiveness of our products and services. We use, for instance:

- *IP addresses*

Hilverda De Boer anonymously registers IP addresses, online identification numbers of devices used by visitors to visit our website for IT security and diagnostic purposes.

- *Google Analytics*

Hilverda De Boer uses Google Analytics. For more information about the use of Google Analytics, please visit the information page of [Google Analytics](#). Google Analytics is also used to anonymise the data of visitors.

2. Data retention

We do not retain your personal data longer than is reasonably necessary in order to achieve the purposes set out in this privacy statement or to be able to comply with legislation.

Most personal data is not retained any longer than is necessary for the performance of the agreement, to enable us to honour the agreements made with you and/or to be able to deal with any disputes. If

the personal data is subject to a (longer) statutory retention period, we will, of course, honour that period. This applies, for instance, to data we have to save for our accounts. In that case, the statutory retention period is seven years. In the event of a dispute, and if there is no statutory obligation to retain your personal data longer, we will destroy your personal data no later than one year after the agreement has ended and mutual obligations ensuing from the agreement have been fulfilled.

3. Sharing personal data with third parties

In certain cases, we may share your personal data with third parties. Your personal data is forwarded to third parties only for the purposes set out in this privacy statement and only on the basis of the principles set out in this privacy statement. Among other things, we may disclose your personal data with the following categories of third parties in the following cases:

- a. we may have a statutory obligation to share personal data with a government body;
- b. we may disclose your personal data to ICT service providers who offer us support to keep our software systems and website secure and stable;
- c. we may use a legal aid insurer, a collection agency or a firm of lawyers to collect a claim against you or to resolve a dispute with you;
- d. our accountant, an administrative office or another consultant may receive your personal data if they need it in order to complete their work for us;
- e. we may use an external server to store your personal data, for which reason we disclose your personal data to a third party;
- f. we may disclose your personal data to our insurer in connection with our liability.

Third parties to whom we disclose your personal data are personally responsible for compliance with privacy legislation. We are not responsible or liable for the processing of your personal data by these third parties. This will be different when a third party is hired in order to process personal data on our behalf and receives your personal data from us within that framework. In that case, we will conclude a processing agreement with that third party that complies with the requirements set out in the GDPR.

We will not disclose your personal data to a third country or an international organisation.

4. The security and integrity of data

Hilverda De Boer has security policies and procedures in place to protect your personal data against unauthorised loss, misuse, changes or destruction. We will do our best to restrict access to your personal data only to those who are involved in providing services to you on behalf of Hilverda De Boer and who are otherwise entitled to do so within the framework of privacy legislation. Individuals who have access to personal data are obliged to respect the confidentiality of such information.

5. Inspecting, correcting or deleting data

If you have given your personal data to Hilverda De Boer, you do, in most cases, have the right to inspect this personal data and to correct any inaccuracies. You can also send us a request to inspect your personal data. In that case, we will send you the information. Before we transmit the personal data to you, we may ask you to identify yourself and to provide us with the necessary details of your interaction with Hilverda De Boer, enabling us to find your personal data quickly. When you make a copy of your proof of identity, please obscure, on the copy, your photograph, the MRZ (machine-readable zone, the strip with numbers at the bottom of your passport), the passport number and the citizen service number. This is to protect your privacy.

You also have the right to object to the processing of your personal data by Hilverda De Boer if we are not or no longer authorised to use this data and you also have the right to ask for the removal of your personal data if we retain it too long. In certain cases, you also have the right to restrict the

processing of your personal data by Hilverda De Boer or to ask Hilverda De Boer to transfer your data in a computer/machine-readable file.

If you wish to exercise any of the aforementioned rights, please contact us on privacy@hilverdadeboer.nl. We will make every reasonable effort to be able to comply with your request, as long as it complies with the applicable legislation and professional standards. Hilverda De Boer aims to follow up or carry out requests within the statutory period of one month; depending on the complexity and number of requests, this period may be extended by a maximum of two months. You will be notified of a possible extension of the aforementioned period within one month of your request. Furthermore, we may not be obliged to honour your request. In that case, we will substantiate this.

Hilverda De Boer would also like to note that you can submit a complaint to the national supervisory authority, the Dutch Data Protection Authority. You can do this via this link <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

6. Data breach

A data breach is when unauthorised persons expose the personal data of our customers, employees or clients to unlawful processing, publication or loss.

Among other things, this may be the case when a laptop, telephone or USB key is lost or stolen or when a data file or system is breached.

In the event of a serious data breach, Hilverda De Boer has an obligation to notify the Dutch Data Protection Authority thereof within 72 hours of its discovery and also, if applicable, the persons whose personal data has been breached.

If you suspect or have identified a (potential) data breach, please notify us as soon as possible via privacy@hilverdadeboer.nl. Please state your name, company name, telephone number and a brief description of the data breach in this email. As soon as we have received your notification, we will contact you for more information, enabling us to take measures to minimise the potential consequences.

7. Automated decisions

No automated decisions are made.

8. Changes to this policy

Hilverda De Boer change this Privacy Statement from time to time. When we make changes to this Privacy Statement, we will change the “most recently changed on” date given at the top of this page. We recommend consulting the Privacy Statement on a regular basis so that you are up to date of the way in which Hilverda De Boer protects your personal data. In the event of significant changes to this privacy statement, we will not only change the date but we will also make a clear announcement on our website.

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