

# Privacy & Cookie Statement

## Index

1. Aartsen	3
2. General	3
3. Which personal data do we collect and for which purposes?	3
3.1 Processing on the basis of a legal obligation	3
3.2 Processing necessary for the performance of a contract between you and us	3
3.2.1. General information	4
3.3 Processing necessary for defending our legitimate interests	4
3.3.1. Improving our services	4
3.3.2. Keeping the Service safe	4
3.3.3. To inform you about our other services	4
3.3.4. In case you apply for a position	4
3.4 Processing with your consent	5
3.4.1. To inform you (at your request) about the Service we have rendered to you	5
3.4.2. To inform you at your request and to answer your questions	5
3.4.3. Visual material, e.g. photos and videos	5
3.4.4. Tracking cookies	6
4. Sharing personal data	7
4.1 Sharing with processors for which your consent is not necessary	7
4.2 Sharing data with your consent	8
4.3 Our legal responsibility	8
4.4 Merger or sale (part) of the company	8
5 . Protection of personal data	8
6 . Links to third party sites	9
7. Your rights	9
8. Contact	10

## **1. Aartsen**

Within this privacy statement the following companies are regarded as Aartsen: Aartsen Holding B.V., Aartsen Breda B.V., Aartsen Venlo B.V., Aartsen, België N.V. and Aartsen Asia Ltd.. Aartsen attaches great importance to carefully and safety handling of privacy-sensitive information of its (website) visitors, customers, relations, candidates and employees. We are active in the European Economic Area (EEA) and we store our data on servers in the EEA, unless indicated otherwise.

This privacy statement applies to the following entities:

- Aartsen Holding B.V.
- Aartsen Breda B.V.
- Aartsen Venlo B.V.
- Aartsen België N.V.
- Aartsen Asia Ltd.

We process your personal data when you use our services, applications, websites, software, actions for customers and/or participation in events organised by Aartsen or third parties. We call this the "Service". In this privacy statement we summarize when and how we collect, use and secure your personal data with regard to our Service.

## **2. General**

We may change provisions of this privacy statement from time to time. If we do that, we will inform you of the changes. However, we also advise you to check for yourself from time to time whether the privacy statement has been changed.

## **3. Which personal data do we collect and for which purposes?**

There are a number of ways in which we can collect your personal data. In this section we explain which personal data we may collect from you. The personal data are sorted according to the different processing goals. The data retention period also differs depending on the processing goal. This period will also be mentioned below. Note that should there be any legal changes to the possible data retention periods, these legal changes will take precedent over the periods mentioned in this privacy statement.

Personal data collected directly by us or provided directly to us by you:

### **3.1 Processing on the basis of a legal obligation**

Administrative obligations: we retain this personal data for a maximum of 10 years:

- your name
- your address
- your purchases and purchase orders (if applicable)
- your tax identification number (VAT) / proof of identification

If you wish to use our Service, you must provide this personal information to us. The reason for this is that these data are needed to comply with our legal and fiscal obligations.

**3.2 Processing necessary for the performance of a contract between you and us, or you and third parties on the platform (delivering the Service).**

3.2.1. General information needed for rendering our Service to you: we will retain these data for as long as the agreement lasts, and for up to 2 years after the agreement has ended

- name
- private and/or business e-mail address (for contacting you in regard to the Service)
- your private and/or business telephone number

If you wish to use our Service, you must provide this personal information to us, otherwise we will not be able to provide our Service.

### 3.3 Processing necessary for defending our legitimate interests

3.3.1. Improving our services: we retain these personal data up to 2 years after we collected the personal information

- your name
- a number to identify you on our services (user or session ID)

3.3.2. Keeping the Service safe: we retain these personal data up to 6 months after we collected the personal information

- your IP-address
- a number to identify your device on our services (device -ID)
- a number to identify you on our services (user or session ID)
- the operating system you are using
- the time, date and place of login

3.3.3. To inform you about our other services (if you have purchased a paid service from us): we will retain these personal data until you indicate that you no longer wish to receive marketing information

- your e-mail address

3.3.4. In case you apply for a position: we retain these personal data up to 4 weeks after the end of the application process, or we retain these personal data up to 1 year after the end of the application process when you give permission.

- your name
- your address
- your e-mail address
- your telephone number
- your motivation letter, curriculum vitae and the data within these documents (e.g. your photo, education, internships, work experience and trainings)
- availability information
- other personal information you provide in the application process

We process these personal data on the basis of a weighing of interests. If you do not want to provide the data mentioned in 3.3.1. or 3.3.2 please let us know your reasons for objecting. We will take your reasoning into account and weigh it against our interests. If we come to the conclusion that you will need

to provide your personal data, you cannot use our Service if you refuse to provide the personal data. More information about your rights can be found below under the heading 'Your rights'.

You can unregister ('opt out') from our mailing list for the processing mentioned under 3.3.3. by following the cancellation instructions which are included with each marketing e-mail. If you opt out, this will not affect our ability to send you important e-mails about the Service and your account. In addition, it does not affect our ability to use your personal data as described in this privacy statement.

### 3.4 Processing with your consent

3.4.1. To inform you (at your request) about the Service we have rendered to you or other services offered by us: we will retain these personal data until you indicate that you no longer wish to receive marketing information

- your name
- the organization at which you are employed
- your private and/or business e-mail address
- your private and/or business telephone number

3.4.2. To inform you at your request and to answer your questions: we retain these personal data for up to 2 months after your request or question has been processed.

- your name
- the organization at which you are employed
- your private and/or business e-mail address
- other personal data that you enter when contacting <COMPANY>

3.4.3. Visual material, e.g. photos and videos (during events organized by Aartsen or third parties)

- Photos
- Videos
- Other visuals

### 3.4.4. Tracking cookies

Category	Cookie name	Provider	Purpose	Expiration date	Type
Functional	CONCRETE5	Concrete5	Saving the users PHP session ID to retrieve data	Session	HTTP
Marketing	Google Analytics	Google	Used to send data to Google Analytics about the device and visitor behavior. Tracks the visitor on different devices and marketing channels.	Session	
Marketing	Facebook Pixel	Facebook	Used by Facebook to deliver a range of advertising products, such as real-time bidding from external advertisers.	3 months	
Marketing	Conversie tracking	Google	Used by Google AdWords to re-engage visitors who can convert to customer status based on the visitor's online behavior on different websites.	Session	
Marketing	LinkedIn Insight Tag	LinkedIn	Used by social network service, LinkedIn, to track the use of embedded services.	2 years	
Necessary	Cookie-level	EnoRm	Gives an indication of which cookie level the user has accepted (necessary, functional, recommended)	31 days	
Unknown	driftt_aid	Drift	Not classified	2 years	
Unknown	driftt_sid	Drift	Not classified	31 days	

Statistics	<code>_ga</code>	Google	Registers a unique ID that is used to generate statistical data about how the visitor uses the website.	Session
Statistics	<code>_gat UA_</code>	Google	Used by Google Analytics to slow down request speed.	Session
Statistics	<code>_gid</code>	Google	Registers a unique ID that is used to generate statistical data about how the visitor uses the website.	Session

#### External links

Our website may refer to third-party websites that may also use cookies. We have no control over the cookies that these websites use. View the privacy statement of the website for further information.

#### Cookies verwijderen

Cookies are stored on your computer and can be deleted at any time. Click on one of the links below for an explanation of how to do this.

- [Chrome](#)
- [Internet Explorer](#)
- [Firefox](#)
- [Safari](#)
- [Opera](#)

It is important to know that the use of cookies on our website is safe. Cookies do not result in spam or unwanted e-mails or phone calls. Our cookies are not used to build a personal profile.

## 4. Sharing personal data

We only share your personal data in the way, and with the parties, mentioned in this privacy statement.

### 4.1 Sharing with processors for which your consent is not necessary

We use other parties to help with the delivery of the Service. It is possible that these third parties process your personal data. These third parties are referred to as "Processor" in this privacy statement. We conclude processing agreements with these processors.

We use the following types of processors:

- companies that provide storage of (personal) data and database management and maintenance;
- research firms and providers of analytical software to improve our services (e.g. privacy-friendly Google Analytics that does not share personal data with Google);

- hosting provider(s);
- providers of customer management software;
- providers of video software and storage;
- marketing and/or communication agencies and printing offices.

In some cases, the Processor may collect your personal data on our behalf. We contractually agree with the Processors that they may only use personal data that they obtain from us to enable the provision of the Service. Processors may not use this information for advertisement purposes.

If you provide additional information to these processors yourself, we are not responsible for this. It is wise to inform yourself properly about the Processor and his company before you provide your personal data.

#### 4.2 Sharing data with your consent

We may also share personal data with others if you give us permission to do so. For example we can cooperate with other parties to offer you specific services or offers. If you register for these services or marketing offers, we may provide your name or contact details if they are necessary to provide that service or contact you. Before we do this, you will always be expressly asked for your consent.

#### 4.3 Our legal responsibility

We may also share personal data with third parties if this is:

1. reasonably necessary or appropriate to comply with our legal obligations;
2. necessary to comply with legal requests from authorities;
3. required to respond to any legal claims;
4. necessary to protect the rights, property or safety of us, our users, our employees or the public;
5. required to protect ourselves or our users against fraudulent, abusive, inappropriate or unlawful use of the Service.

We will immediately notify you if a government agency makes a request that relates to your personal data, unless we are not allowed to do so on the grounds of the law.

#### 4.4 Merger or sale (part) of the company

It may happen that we disclose, share or transfer your personal data when we transfer (part of) our business. Examples include (negotiations about) a merger, sale of (parts of) the company or obtaining loans. We will of course try to limit the impact for you as far as possible by transferring personal data only when necessary.

## 5 . Protection of personal data

Protecting your personal data is of the utmost importance for us. We have therefore taken appropriate technical and organizational security measures in order to protect your personal data. These measures include, but are not limited to:

- Physical and electronic) measures to prevent for unauthorized access, loss or improper use of personal data.
- The use of TLS (Transport Layer Security) technology to encrypt sensitive information or personal data, such as account passwords and other identifiable information about payments.
- The backups of personal data that will be made when reasonably possible.
- The encrypted sensitive storing of sensitive information.
- Dealing with vulnerabilities in the software as quickly as reasonable possible.



We would like to point out that absolute security for sending personal data via the internet or storing personal data cannot always be guaranteed. We advise you to take this into account when deciding whether or not to give consent for processing your personal data.

## **6 . Links to third party sites**

Our platform may contain links to other websites and services. In addition, our platform can also provide advertisements from third parties. Third party websites and services can collect and retain information about you. If you provide your personal data to third parties, then we are not involved. We have no control over these sites or the activities of the third parties. In that case, the privacy policy of the third party applies. We are not responsible for the content of the privacy policy of these parties and the way in which these parties deal with personal data. We encourage you to review their privacy and security practices and policies before you provide personal information to them.

## **7. Your rights**

Privacy legislation gives you certain rights with regard to your own personal data. The rights that we describe below are not absolute rights. We will always consider whether we can reasonably meet your request. If we cannot meet your request, or if it would be at the expense of the privacy of others, we can refuse your request. If we refuse a request, we will let you know and explain our reasons.

### Right of access

You have the right to request which personal data we process about you. You can also ask us to provide insight into the processing grounds, relevant categories of personal data, the (categories of) recipients of personal data, the retention period, the source of the data and whether or not we use automated decision making.

You may also request a copy of your personal data that we process. Do you want additional copies? Then we can charge a reasonable fee for this.

### Right to rectification

If the personal data processed by us about you are incorrect or incomplete, you can request us to adjust or supplement the personal data.

If we grant your request, we will, to the extent reasonably possible, inform the parties to whom we provide information.

### Right to erasure

Do you no longer want us to process certain personal data about you? Then you can request us to delete certain (or all) personal data about you. Whether we will delete data depends on the processing ground. We only delete data that we process on the basis of a legal obligation or for the performance of the agreement if the personal data are no longer necessary. If we process data based on our legitimate interest, we will only delete data if your interest outweighs ours. We will make this assessment. If we process the data on the basis of consent, we will only delete the data if you withdraw your consent. Have we accidentally processed data or does a specific law require that we delete data? Then we will delete the data. If the data is necessary for the settlement of a legal proceeding or a (legal) dispute, we will only delete the personal data after the end of the proceedings or the dispute.

If we grant your request, we will, to the extent reasonably possible, inform the parties to whom we provide information.

### Restriction of processing

If you dispute the accuracy of personal data processed by us, if you believe that we have processed your personal data unlawfully, if we no longer need the data or if you have objected to the processing, you can also request us to restrict the processing of that personal data. For example, during the time that we need to assess your dispute or objection, or if it is already clear that there is no longer any legal ground for further

processing of those personal data, but you still have an interest in us not deleting the personal data. If we limit the processing of your personal data at your request, we may still use that data for the settlement of legal proceedings or a (legal) dispute.

#### Right to data portability

At your request, we may transfer the data that we automatically process to execute the agreement or based on your consent, to you or another party designated by you. You can make such a request at reasonable intervals.

#### Automated individual decision making

We do not take decisions based solely on automated processing.

#### Right of restriction of processing and withdrawal of permission

If we process data on the grounds of a legitimate interest, you may object to the processing. If we process data on the basis of your consent, you may withdraw that consent. For more information, please refer to the relevant processing purposes above.

#### Exercising your rights

You can send a request for access, correction, deletion, data transfer of your personal data or request for withdrawal of your consent or objection to the processing of your personal data to undersigned.

To prevent abuse, we ask you to identify yourself adequately in the case of a written request for access, rectification or erasure. You can do this by sending a copy of a valid proof of identity. Do not forget to screen off your citizen service number and passport photo on the copy.

We strive to process your request, complaint or objection within a month. If it is not possible to make a decision within a month, we will inform you of the reasons for the delay and the time when the decision is expected to be made (no longer than 3 months after receipt).

#### Dutch Data Protection Authority

Do you have a complaint about our processing of your personal data? Please contact us. We are happy to assist you. If we cannot come to a solution, you are also entitled to submit a complaint to the national privacy authority, in this case the Dutch Data Protection Authority via <https://autoriteitpersoonsgegevens.nl>.

### **8. Contact**

If you have questions, concerns or comments about this privacy statement or our data processing, please contact undersigned.

Breda, 25<sup>th</sup> of September 2019

On behalf of Aartsen

Marcel Hendriks