

# **Privacy statement**

Your privacy is of great importance to us. We therefore comply with the relevant laws and regulations, including the General Data Protection Regulation (hereinafter: GDPR).

Your data is safe with us and we will always use this data properly. In this privacy statement we explain what Maxxton does with information that we learn about you.

The information in this privacy statement relates to our applicants, customers, suppliers, potential customers, visitors and website visitors.

This privacy statement applies to Maxxton B.V.

If you have any questions or would like to know exactly what we keep about you, please contact Maxxton. The contact details can be found at the bottom of this privacy statement.

### **Processes**

Below you will find the processes that take place within our organization. A short description of the purpose is given for each process, together with the personal data that are processed in the process. You can also see which third parties (possibly) also process your personal data.

### Job applications received

Purpose: When you apply for a job with us, we process various personal data about you. Below you can see which data we process and how long we keep it. Maxxton treats the information they receive from you as an applicant confidentially.

| Which details do we process?  | On what basis do we process this data? | How long do<br>we keep this<br>data? | Third parties involved |
|---|--|--------------------------------------|------------------------|
| Age   | Legitimate interest                    | 28 days End of application procedure | Google                 |
| Name and address details (First name, Last name, Initials, Street name, Home number, Zip code, Place of resident, Country of residence) | Legitimate interest                    | 28 days End of application procedure | Google                 |
| Contact details   | Legitimate interest                    | 28 days End of application procedure | Google                 |
| Function details (Education details, current function, previous function))  | Legitimate interest                    | 28 days End of application procedure | Google                 |



### CV's kept in file for later moment

If you have applied for a job with us, but we are currently not a match, you can give us consent to keep your data in order to possibly contact you at a later time. Below you can read which data we process in this case and for how long.

| Which details do we process?  | On what basis do we process this data? | How long do<br>we keep this<br>data? | Third parties involved |
|---|--|--------------------------------------|------------------------|
| Name and address details (First name, Last name, Street name, Initials, Home number, Zip code, Place of resident, Country of residence) | Consent                                | 1 year<br>After last<br>contact      | Google                 |
| Age   | Consent                                | 1 year<br>After last<br>contact      | Google                 |
| Contact details   | Consent                                | 1 year<br>After last<br>contact      | Google                 |
| Function details (Education details)  | Consent                                | 1 year<br>After last<br>contact      | Google                 |

### **Mailing Sales**

Purpose: Sending newsletters to our customers or when you have indicated that you wish to receive our newsletters

Below you can read which of your data we process and for how long it will be processed if you have given your consent to receive our newsletters.

| Which details do we process?                     | On what basis do we process this data? | How long do we keep this data?                                  | Third parties involved                |
|--|--|---|---------------------------------------|
| Name and address details (First name, Last name) | Consent                                | 7 days After unsubscribing from newsletter by customer or sales | The Rocket     Science Group,     LLC |
| Contact details (E-mail address)                 | Consent                                | 7 days After unsubscribing from newsletter by customer or sales | The Rocket     Science Group,     LLC |



### **Support – customers**

Purpose: You can read below how and in what way we process your data when you ask us a question via support

| Which details do we process?                               | On what basis do we process this data? | How long do we keep this data? | Third parties involved                                     |
|--|--|--------------------------------|--|
| Name and address details (First name, Last name, Initials) | Performance of contract                | As long as strictly necessary  | <ul><li>Google Cloud<br/>Platform</li><li>Google</li></ul> |
| Contact details<br>(E-mail address)                        | Performance of contract                | As long as strictly necessary  | <ul><li>Google Cloud<br/>Platform</li><li>Google</li></ul> |
| Contract   | Performance of contract                | As long as strictly necessary  | <ul><li>Google Cloud<br/>Platform</li><li>Google</li></ul> |

# Sales - approach new customers

Purpose: Below is a description of how and when we will approach you if you can become a potential new customer of ours Below you can read a description of when and how we will approach you if you have indicated that you are interested in our services.

| Which details do we process?  | On what basis do we process this data? | How long do we keep this data? | Third parties involved                      |
|---|--|--------------------------------|---|
| Name and address details  (First name, Last name, Initials, Country of residence, Company name) | Legitimate interest                    | 5 years<br>After last contact  | <ul><li>Google</li><li>Salesforce</li></ul> |
| Contact details (E-mail address, Mobile phonenumber)  | Legitimate interest                    | 5 years<br>After last contact  | <ul><li>Google</li><li>Salesforce</li></ul> |

### Sales - potential becomes customer

Purpose: Below you can see what we process when we enter into a relationship

| Which details do we process?   | On what basis do we process this data? | How long do we keep this data?        | Third parties involved  |
|--|--|---------------------------------------|---|
| Contact details (E-mail address, Mobile phonenumber)                             | Performance of contract                | 2 years After termination of contract | <ul><li>Google</li><li>Salesforce</li><li>Google Cloud<br/>Platform</li></ul> |
| Name and address details (Country of residence, Initials, Last name, First name) | Performance of contract                | 2 years After termination of contract | <ul><li>Google</li><li>Salesforce</li><li>Google Cloud<br/>Platform</li></ul> |



### Leaving contact details on website

Purpose: Your data is processed when you leave your data when you visit our website. Below you can see which data this is and when this happens

| Which details do we process?                     | On what basis do we process this data? | How long do we keep this data?                | To which parties do we provide this data?   |
|--|--|---|---|
| Name and address details (First name, Last name) | Performance of contract                | 28 days<br>After assessing mutual<br>interest | <ul><li>Google</li><li>Salesforce</li></ul> |
| Contact details                                  | Performance of contract                | 28 days<br>After assessing mutual<br>interest | <ul><li>Google</li><li>Salesforce</li></ul> |
| Function details (Job title)                     | Performance of contract                | 28 days<br>After assessing mutual<br>interest | <ul><li>Google</li><li>Salesforce</li></ul> |

### Office visit

Purpose: Below you can see what we process from you when you visit our office in the Netherlands

| Which details do we process?                                   | On what basis do we process this data? | How long do we keep this data? | To which parties do we provide this data?  |
|--|--|--------------------------------|--|
| Name and address details (First name, Last name, Company name) | Legitimate interest                    | 2 months<br>After visit        | <ul><li>Google</li><li>Microsoft</li></ul> |
| Keys (Key number, Date of visit, Purpose of visit)             | Legitimate interest                    | 2 months<br>After visit        | <ul><li>Google</li><li>Microsoft</li></ul> |

### **Debtors & Creditors administration**

Purpose: Conducting debtor and creditor administration, including collecting receivables and possibly sending reminders.

For this administration we are legally obliged to process various data and to store it for a longer period. In certain cases, this is personal data, for example when the debtor is a natural person. Or when we communicate with a contact person within your organization.

| Which details do we process?  | On what basis do we process this data? | How long do<br>we keep this<br>data? | To which parties do we provide this data?          |
|---|--|--------------------------------------|--|
| Name and address details (Company name, Full name)  | Legal obligation                       | 7 year<br>After transaction          | <ul><li>Exact Online</li><li>Remmerswaal</li></ul> |
| Financial ( Payment conditions, Rate, Services rendered, Bankaccount number, Debtor or creditor number, Invoice date, Invoice number, Outstanding balance, Reminders, VAT number) | Legal obligation                       | 7 years<br>After transaction         | <ul><li>Exact online</li><li>Remmerswaal</li></ul> |



#### Video surveillance HQ

Purpose: Securing the office building and employees through camera surveillance

To guarantee your and our property and safety, there is video surveillance in and around our building in a few places. The cameras are visible and the images are only viewed when there is reason to do so.

| Which details do we process? | On what basis do we process this data? | How long do we keep this data? | To which parties do we provide this data? |
|------------------------------|--|--------------------------------|---|
| Photo, video & audio         | Legitimate interest                    | 28 days                        | Internal server                           |
| Date & time                  | Legitimate interest                    | 28 days                        | Internal server                           |

### Receivers

We have listed above for each process which third parties may be involved in the processing of your personal data. Below you will find a complete overview of these parties, with their role and contact details. In this way we ensure that you always know where your personal data is processed.

Some third parties may process your personal data outside the EU. We always ensure that the correct (contractual) measures have been taken for this, as prescribed by the GDPR. An important part of this is that we take so-called "appropriate guarantees". You can read below what these are per recipient.

| Involved parties             | Role in processing               | Contact details involved party  |
|------------------------------|----------------------------------|---|
| Remmerswaal                  | Administrative office            | Onder de Linden 7<br>4695 BV , Sint Maartensdijk<br>Nederland   |
| Rabobank                     | Finance and Pension fund advisor | Croeselaan 18<br>3521 CB , Utrecht<br>Nederland   |
| Allianz Nederland Groep N.V. | Pension fund                     | Coolsingel 120<br>3011 AG ROTTERDAM   |
| Exact Netherlands BV         | Accounting software              | Molengraaffsingel 33<br>2629 JD , Delft   |
| Microsoft                    | Office/ software solutions       | One Microsoft Way 1 98052, Redmond Verenigde Staten  Processing (possibly) takes place outside the EEA Safeguards/additional measures: Binding Corporate Rules (United States of America) |
| Unit4                        | IT- administrator                | Stationspark 1000<br>3364 DA, Sliedrecht  |



| Salesforce                    | CRM system                             | Gustav Mahlerlaan 2970 1081 LA, Amsterdam  Processing (possibly) takes place outside the EEA Safeguards/additional measures: : Standard Contractual Clauses (United States of America)   |
|-------------------------------|--|--|
| Mailchimp                     | Direct mailing                         | 675 Ponce de Leon Ave NE Suite 5000<br>Georgia 30308, Atlanta<br>Verenigde Staten  Processing (possibly) takes place outside the EEA<br>Safeguards/additional measures: : Standard Contractual<br>Clauses (United States of America) |
| Google                        | Marketing/ Analytics/ Customer service | 1600 Amphitheatre Parkway 1600 CA94043, Mountian View Verenigde Staten  Processing (possibly) takes place outside the EEA Safeguards/additional measures: Standard Contractual Clauses (United States of America)                    |
| Google Cloud Platform         | Hosting                                | 1600 Amphitheatre Parkway 1600 CA94043, Mountain View Verenigde Staten  Processing (possibly) takes place outside the EEA Safeguards/additional measures Standard Contractual Clauses (United States of America)                     |
| The Rocket Science Group, LLC | Main entity Mailchimp (direct mailing) | 675 Ponce de Leon Ave NE Suite 5000<br>Georgia 30308, Atlanta<br>Verenigde Staten<br>Processing (possibly) takes place outside the EEA<br>Safeguards/additional measures Standard<br>Contractual Clauses (United States of America)  |

# **Changes in the privacy statement**

When our organization changes or our processes change, this may have consequences for the processing of your personal data. We will always communicate transparently with you about this. If necessary, we will adjust this privacy statement. At the top you can see the effective date of this privacy statement.

# **Your rights**

When we process your personal data, you have certain rights. You can exercise these by submitting a request, indicating which right (or rights) you wish to exercise. For this you can use the contact details that you will find at the bottom of this privacy statement.

Make sure that you always clearly indicate who you are, so that we can be sure that we do not change or delete data from the wrong person. The above rights depend on the legal basis on which we base the processing of your personal data. For more information about your rights, we refer to the website of the Dutch Data Protection Authority.

It is also possible that under certain circumstances we are legally unable to follow up on your request.



For example, when we are prohibited from doing so by law or by a competent authority. If possible, we will inform you about this when you submit your request.

In principle, we will comply with your request within 1 month. However, this period may be extended for reasons related to the specific rights of data subjects or the complexity of the request. If we extend this term, we will inform you in good time.

You have the following rights:

### **Right of access**

Would you like to know which of your personal data Maxxton processes? Then you can submit a request for access. We probably process multiple categories of personal data from you and/or for multiple purposes. You may wish to view only part of these processing operations. Please indicate with your request exactly what you would like to see.

### Right to rectification

Does your personal data at Maxxton appear to be incorrect, incomplete or irrelevant? Then you can make an additional request to have your data changed or supplemented. You can request rectification if your personal data is incorrect, incomplete, irrelevant to the purpose for which it was collected or if we use your data in a way that you believe is illegal.

### Right to be forgotten

You can, in a number of cases, ask Maxxton to delete your personal data. However, we think it is important to inform you that we may not be able or allowed to delete all your data. We will always inform you about this.

## Right to data portability

You can invoke the right to data portability (transferability of personal data) if Maxxton processes your data because you have given us Consent to do so. Or to perform an agreement with you. Please note: this only applies to data that Maxxton processes digitally, so not to paper files.

### Right to restriction of processing

In certain situations, an organization may no longer use your personal data. But the organization cannot (yet) delete the data. The organization must then temporarily stop using your data. This is called the right to restriction of processing. You can ask Maxxton to restrict the processing of your data.

### Right to object

You have the right to ask Maxxton to stop using your personal data in two situations. This is called the right of objection. Firstly, if we use your data for direct marketing. Secondly, you can object to the use of your personal data because of your specific situation.

### Right to withdraw consent

Does Maxxton process your personal data based on your consent? Then you can withdraw your consent at any time. From that moment on, we no longer process your personal data. Unless there is (also) another basis for processing your data.

### **Technical and organizational measures**



Security of personal data is of great importance to us. To protect your privacy, we take the following measures:

#### **Technical measures:**

- Firewalls
- Password protected WiFi
- ISAE 3402 Type I certification
- Up to date virus and malware protection software
- Daily back-ups

### **Organizational measures**

- Standard procedures for blocking access to all former Employees
- Appropriate secure settings for devices and software, only manageable by system administrator
- · Regular security awareness training to staff
- Periodical testing of effectiveness of the security measures (both internally and externally)

# Make a complaint

If you wish to make a complaint about the use of your personal data, you can send an email to dpo@maxxton.com. We handle every complaint internally and communicate this further with you. In addition, you have the right to file a complaint with the supervisory authority at any time. In the Netherlands this is the Dutch Data Protection Authority.

### **Contact details**

If you have any questions or want to know what personal data we have about you, please contact us. See the contact details below.

Maxxton B.V. Kousteensedijk 5 4331 JE Middelburg The Netherlands

E-mailadres: dpo@maxxton.com Telefoon: +31 (0)118 671010