

# **PRIVACY STATEMENT NESKRID 4ALLFEET**

## **1. INTRODUCTION**

In this privacy statement, we explain what data we process about you in the event we have a business relationship with you, or want to establish or have had such a relationship. We explain why and for how long we process your data, and your rights in relation to any processing. We also provide information about the parties we work with and our security policies, among other things.

It is important to us that our services are reliable and transparent, which is why we handle your personal data with discretion and care, and ensure that processing of your data complies with applicable laws and regulations.

## **2. CONTROLLER OF PERSONAL DATA PROCESSING**

The controller's details:

Neskrid 4Allfeet B.V.  
Ericssonstraat 2 – GATE2  
5121 ML  
Rijen (Netherlands)

## **3. PRIVACY MANAGER**

We have appointed a Privacy Manager. This person is not a data protection officer, as referred to in Article 37 of the GDPR, but does nevertheless ensure that your data is processed in accordance with the law. The Privacy Manager's duties include monitoring and handling inquiries and complaints. Our Privacy Manager's contact information:

P. Pijnenburg  
privacy@neskrid.com  
+31 850080081

## **4. THE PERSONAL DATA WE PROCESS**

Depending on your relationship with our organisation and the purpose for which we process data, we always record all or some of the following information:

- a) First and last name;
- b) Address details;
- c) Phone number;
- d) Email address;
- e) Job details;
- f) VAT number;
- g) IBAN nummer;
- h) Business registration number specialist;
- i) Data about your activities on our website.

## **5. THE PURPOSE AND BASIS UNDERLYING OUR PROCESSING OF PERSONAL DATA**

We process your personal data for the following purposes:

- a. to keep financial records;
- b. to process and execute assignments;
- c. to carry out acquisition work;
- d. to maintain applicant (vacancy-candidate) records;
- e. to monitor website traffic.

The grounds for processing are referred to in Article 6 of the GDPR (consent, legal duty, performance of a contract, or legitimate interest).

## **6. AUTOMATED DECISION-MAKING**

We do not rely on automated processing to make decisions about matters that could significantly affect individuals. These are decisions made by computer programs or systems, without human (e.g. one of our employees) intervention.

## **7. HOW LONG WE RETAIN PERSONAL DATA**

As a rule, we do not retain your data longer than necessary for the purposes for which we collected them. The retention period varies from case to case. For example, we are obliged to retain some documents for a minimum period for tax or administrative purposes. In such cases, we retain only the data necessary to fulfil our legal obligations. After the legal retention periods end, we will delete or anonymise your data.

## **8. SHARING PERSONAL DATA WITH THIRD PARTIES**

We do not share your personal data with third parties unless this is in the context of the performance of an agreement with you, to comply with any legal obligation, or to pursue a legitimate interest. To the extent that these third parties are considered processors, we enter into a processor agreement with them that addresses, among other things, security, confidentiality, and your rights. We remain responsible for such processing.

We engage third parties in the manner and on the grounds described above for the following categories of processing

- a. to keep financial records;
- b. to process and execute assignments;
- c. to carry out acquisition work;
- d. to maintain applicant (vacancy-candidate) records;
- e. to monitor website traffic.

## **9. COOKIES, OR SIMILAR TECHNOLOGY, THAT WE USE**

We use cookies on our website. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone the first time you visit this website.

We use the following cookies:

- a. Cookies with purely technical functionalities. These ensure that the website works properly and that, for example, your preferences are remembered. These cookies are also used to make the website work properly and to optimise it;
- b. Analytical and other cookies that track your browsing behaviour so that we can provide customised content and ads. When you visit our website, we have already asked your permission to place these cookies;
- c. Tracking and other cookies placed by third parties. These include advertisers and social media companies. When you visit our website, we have already asked your permission to place these cookies.

These cookies process some of the following types of personal data, depending on what you have consented to:

- Visited websites;
- IP addresses;
- Cookie content;
- Referrer-URL;
- Browsing behaviour.

We process these personal data for the following purposes;

- Showing targeted ads;
- Measuring the effectiveness of an ad;
- Collecting website and other statistics;
- Creating market analyses, target group analyses, and improving the website and navigation within it.

We provide these personal data to the following companies and categories of companies or process these personal data through their services:

- Analytics companies, including Google;
- Social media companies, including Facebook;

We do not retain personal data resulting from these tracking cookies and other cookies for longer than necessary for the purpose for which we collected them. This may vary for each cookie. Below is a summary of the various retention periods:

Cookie name	Retention period
_fbp	3 months
lastExternalReferrer	Ongoing
lastExternalReferrertime	Ongoing
li_sugr	3 months
UserMatchHistory	30 days

You can opt out of cookies by setting your Internet browser to stop storing cookies. In addition, you can adjust your browser's settings to delete any information previously stored.

## **10. YOUR RIGHTS (ACCESS, RECTIFICATION, ERASURE, ETC.)**

The following section explains your rights regarding the processing of your data.

- a) Right of access  
You have the right to access your data. This also covers information about the purposes of the processing, the parties to which the data are provided, and the retention periods.
- b) Right of rectification  
You can ask us to have your data rectified immediately. You also have the right to make incomplete data complete by, for example, sending us an email.
- c) 'Right to be forgotten'  
You have the 'right to be forgotten'. Upon request, we will erase your data without unreasonable delay. However, we may not always erase all of your data. Sometimes, processing is still necessary, for example, for compliance with legal obligations or the establishment, exercise, or substantiation of claims.
- d) Right to restriction of processing  
As a rule, you have the right to have the processing of your data restricted, for example, if you believe that your data are incorrect or unnecessary.
- e) Notice of rectification, erasure, or restriction  
Unless it is impossible or requires disproportionate effort, we will notify recipients of your data of any rectification, erasure, or restriction of processing.
- f) Right to transfer your data  
You have the right to data portability. This means you can request that your data be sent to you. You can save these data for personal reuse. You only have this right with respect to data you have provided to us yourself, and where the processing is based on consent or an agreement to which you are party.
- g) Withdrawal of consent  
If data processing is based on consent, you have the right to withdraw that consent at any time. However, the processing of your data from the period before the withdrawal remains lawful.
- h) Right to object  
As a rule, you have the right to object to the processing of your data. After your objection, we will in principle stop processing your data.
- i) Complaint to Personal Data Authority or go to court.  
If you believe that the processing of your data violates the law, you can contact our Privacy Manager. You also have the right to file a complaint with the Personal Data Authority (AP) or go to court.
- j) Restrictions on your rights  
Sometimes we may restrict your rights, such as in the context of preventing, investigating, detecting, and prosecuting criminal offences, such as fraud.

To verify that the request for access is made by you, upon receipt of your request we will send you a number of verification questions that you must answer before we can process the request. This is to protect your privacy. We will respond to your request as soon as possible, but always within four weeks.

## **11. HOW WE SECURE PERSONAL DATA**

We treat the protection of your data seriously, and we take appropriate measures to prevent abuse, loss, unauthorised access, unwanted disclosure, and unauthorised modification. One of these measures is the use of two-factor authentication (2FA). This provides an additional layer of security by requiring a second method of authentication in addition to a password, such as a one-time code sent via an app or text message.

If you believe that your data are not properly secured or there are indications of misuse, please contact our Privacy Manager.

## **12. CHANGES**

We may change this statement if developments warrant it, for example in the case of new forms of processing. The latest version of our privacy statement can be found on our website. We encourage you to review this privacy and cookie statement periodically to stay informed of changes.