# **Privacy Statement Selmore**

The purpose of this Privacy Statement is to inform you about how we handle your personal data.

### 1. Contact details

Selmore B.V. and Selmore United B.V. ("Selmore") is the controller and has its registered office at (1073 JR) Coöperatiehof 14-16 in Amsterdam. Selmore can be reached by telephone on +31 (0)20 523 91 91 and by email on info@selmore.com.

## 2. Who does this Privacy Statement apply to?

This Privacy Statement applies to all persons and all companies and/or institutions for which Selmore processes personal data, with the exception of persons employed by Selmore. This Privacy Statement therefore applies to: clients of Selmore, potential clients with whom Selmore has made contact or wishes to make contact, visitors to the Selmore website, recipients of newsletters and commercial emails of Selmore, and all other persons who contact Selmore or of whom Selmore processes personal data.

### 3. What personal data do we process?

We process all personal data that you have provided us about yourself or about third parties, personal data generated during your visit to our website and the reading of newsletters, and personal data that we have derived from other sources, such as business social media platforms.

Personal data provided by you:

- contact details and all other personal data that is necessary for the handling of your assignment
- contact details and other personal data entered into contact forms or other web forms
- contact details provided during introductory talks, events, etc., as stated on business cards
- registration number of visitors' vehicles

Personal data obtained from or generated by our website, electronic newsletters, commercial emails or related technologies:

- IP number
- your surfing behaviour on the website, such as data on the first visit, previous visit and current visit, the pages viewed and how the website is navigated
- whether you open a newsletter or commercial email and which parts of it you click on [Click here for our cookie statement]

Personal data obtained from other sources:

- personal data available on public business social media platforms such as LinkedIn
- personal data obtained from the Trade Register of the Chamber of Commerce and from the Land Registry

personal data available on public business websites

Our website may contain hyperlinks to websites of other parties and social media buttons. Selmore is not responsible for the content of those websites or the services of those social media platforms. Furthermore, Selmore is not responsible for the privacy policies and the use of cookies on those websites and social media platforms.

- 4. <u>What do we use your personal data for?</u>We use your personal data for various purposes, namely:
  - 4.1 The performance of an agreement in which you have engaged us.

If you request us to handle your engagement, you will in any case be requested to provide your contact details and the personal data of the other party and/or parties involved. Other personal data may also be necessary for the handling of the engagement, depending on its nature. The data will also be used for invoicing the services provided.

2. Fulfilment of statutory obligations.

Legislation may in certain cases require Selmore to collect, record, retain and process certain information and personal data you provide.

3. Maintaining contact with you.

Your contact details are kept in our customer system and can be used for sending newsletters, updates, invitations to events, and the sending of any information that you have requested from us.

4. Improving our services and executing possible targeted marketing actions.

We think it is important to be able to contact you with information that is relevant to you. To enable this, we combine the personal data available from our site and use it to determine which information and channels are relevant and which times are most suitable for providing information or establishing contact. In our marketing campaigns, we do not process any special personal data. Sometimes we ask clients to participate in an evaluation of the services performed by means of an (online) questionnaire. You can, at any time, indicate that you do not want to be approached for marketing campaigns, newsletters, or that you do not want to participate in an evaluation. We will subsequently no longer approach you for these matters.

- 5. Improving and protecting our website <u>www.selmore.com.</u>
- 6. Creating user statistics.

The user statistics of the website enable us to get a picture of, among other things, the number of visitors, the duration of the visit, which parts of the website are viewed and the click behaviour. These are generic reports, without information about individuals. We use the information obtained to improve the website.

### 5. Legal grounds for the processing of data

We process personal data on the basis of one of the following legal grounds:

## 1. Consent.

If we have asked you to allow us to process your personal data and you have given us consent to do so. This consent may be evidenced by the fact that you submit a question to Selmore by email or otherwise. You are always entitled to withdraw your consent at any time.

5.2 On the basis of an agreement or in the run-up to the conclusion of an agreement.

If you instruct us verbally or in writing to provide services, we will process personal data if and to the extent that this is necessary for the performance of the assignment.

5.3 Statutory obligation.

Legislation may in certain cases require Selmore to collect, record and retain certain information.

## 5.4 On grounds of a legitimate interest.

We may also process personal data if we have a legitimate interest and do not thereby disproportionately infringe upon your privacy. For example, we use your contact details to invite you to meetings and events.

6. Processors

In order to process the personal data provided by you, we make use of other service providers (processors) who exclusively process personal data on our behalf. For example, we work with an external ICT service provider which supports us in keeping our systems safe and stable. We also provide Yellowbrick with registration numbers of visitors' vehicles in order to make a parking place available. We conclude a processing agreement with these processors that meets the requirements set by the General Data Protection Regulation (GDPR). We also use third party services for sending newsletters and commercial emails.

## 7. Sharing personal data with third parties

Selmore will not provide any personal data to third parties if this is not necessary for the execution of the assignment or if there is no statutory obligation to do so.

Your personal data will not be shared with third parties for commercial purposes. There is one exception to this. Sometimes we work together with another organisation to plan a joint activity, such as an event or meeting. In this case, only the necessary contact details will be exchanged.

## 8. Transfer outside the European Economic Area (EEA)

It may sometimes be necessary to transfer your personal data to parties established outside the European Economic Area (EEA). Depending on the circumstances of the case, this may be required for the execution of an assignment by a lawyer or mediator or in the context of a legal action for which we provide you with legal support. We can also use service providers (processors) established outside the European Economic Area (EEA) for the sending of online newsletters and mailings and the processing of data entered in the web forms on our website.

According to the GDPR, personal data may only be transferred to parties outside the EEA if an adequate level of protection of personal data is ensured or if a specific derogation applies.

# 9. Data breach

In the event of a (suspected) data breach, we will act in accordance with the GDPR and the Dutch legislation based thereon, without prejudice to our obligation to remedy or limit the consequences of such breaches as soon as possible.

## 10. Confidentiality

All persons employed by or working for Selmore are obliged to observe confidentiality and respect the confidentiality of any personal data that comes to their knowledge. We guarantee that all persons employed by or working for Selmore have signed a confidentiality agreement.

## 11. Protection

Selmore will demonstrably, appropriately and effectively take technical and organisational security measures which, in view of the current state of the art and the costs involved correspond to the nature of the personal data to be processed, in order to protect the personal data against loss, unauthorised access, mutilation or any form of unlawful processing, and to guarantee the (timely) availability of the data. Selmore will periodically review the security measures and, where necessary, improve these in order to continue to comply with its obligations under the GDPR.

## 12. Intellectual property law

To the extent that the (collection of) personal data is protected by any intellectual property right, you grant Selmore permission to use the personal data in the context of the performance of the assignment.

Questions about your personal data
Each person is entitled by law to exercise certain rights with regard to his or her personal data.

If you have any questions about this, please contact us on +31 (0)20 523 91 91 or via info@selmore.com.

### 14. Complaints?

If you have any complaints about how we handle your personal data, please contact us by sending an email to info@selmore.com or by calling +31 (0)20 523 91 91. We will strive to find a solution with you. If that proves unsuccessful, you can contact the Dutch Data Protection Authority.

## 15. Changes

Developments are rapid and that is why changes may occur in the personal data that we ask of you or in the way we process your personal data. Regulations may also change over time. In that case, we will amend this Privacy Statement. We therefore invite you to check the Privacy Statement regularly so that you remain fully informed. In case of any major changes, we will also draw your attention to these via our website.

Amsterdam, May 2018