

SupMedi BV Privacy Statement

(May 7, 2019)

Introduction

We process personal data in the context of the services we provide. We may receive such personal data from you, such as through your activity on our website, via email, by telephone, or by app, for instance. Moreover, we may obtain your personal data through third parties in the context of the services we provide. Through the present Privacy Statement, we wish to inform you on how we treat such personal data.

Processing Of Personal Data And Purposes

Whenever we process any personal data, we do so in accordance with the requirements as imposed by the Dutch General Data Protection Act (*Algemene Verordening Persoonsgegevens*; “**AVG**”) Which specific personal data we process depends on the exact services and circumstances applicable in individual cases. Usually, such processing involves the following data:

- Name, address, and residence;
- Contact information (email addresses, telephone numbers) and contact person names;
- Bank account number’
- Data on your activities on our website, such as IP address, internet browser, and device type.

Purposes And Foundations Of Processing

In certain instances we may process personal data to meet legal requirements, but mostly, such processing is necessary to provide our services. Certain data is stored for practical purposes or reasons of efficiency, of which we (can) assume that these also serve your own best interests, such as:

- Communication and information;
- Providing our services as efficiently as possible;
- Improvement of our services;
- Invoicing and collection.

In effect, the above also implies that we may use your personal data for marketing purposes, and to send you advertising materials or messages about our services, if we expect these to be relevant for you. We may also contact you to ask your feedback on services provided, or for marketing or other research purposes.

Occasionally, we may wish to process your personal data for purposes other than those stated above. In any such event, we will ask your explicit consent for doing so. If at any time we wish to use your personal data for purposes other than or beyond those for which you have given your consent, we will first ask you for your renewed permission before proceeding.

In closing, we may also use your personal data to protect the rights or property of either our users or our own; and if necessary, to meet our legal obligations.

Provision To Third Parties

In the context of our services, we may employ the services of third parties; such as on occasions where such third parties avail of special means or expertise that we do not possess. Such third parties may be so-called processors or sub-processors, which will process the relevant personal data based on your exact order. Other third parties, which are not necessarily processors of personal data but which can or may nonetheless access such data, include our system administrator, suppliers, online software hosting parties or suppliers, or advisors whose consult is required to carry out your order, for instance. If employment of third parties results in their accessing the personal data, or such data as they record and/or process by other means, we will agree (in writing) with such third parties that they shall adhere to the obligations arising from the aforementioned AVG. Of course, we will only ever employ such third parties as can and may be expected to act as reliable parties, willing and able to adequately handle personal data, and furthermore willing and able to act in full compliance with said AVG. This includes, but is not limited to, such third parties only being allowed to process your personal data for the purposes mentioned above.

Naturally, we may also find ourselves in a situation where we have a legal obligation to submit your personal data to third parties.

Under no circumstances shall we ever submit your personal data to third parties for commercial or charitable purposes without your prior permission.

Duration Of Storage

We shall not process your personal data for longer than is useful in light of the purpose for which such data was submitted (refer to the 'Purposes And Foundations Of Processing' section for further details). This implies that your personal data will be stored for as long as is required to achieve the purposes concerned. Certain data calls for extended storage (usually 7 years), since we have to comply with legal storage requirements (such as fiscal storage obligations) or with directives issued by our industry association.

Security

For purposes of personal data protection, we have implemented appropriate organisational and technical measures; to the extent by which such measures can be expected of us in fairness, taking into account the interests to be protected, current technology standards, and costs incurred for the relevant security measures.

We oblige all our staff and potential third parties necessarily granted access to the personal data to observe full confidentiality. Furthermore, we ensure that our staff are adequately and fully instructed on appropriate handling of personal data, and are sufficiently familiar with the responsibilities and obligations resulting from the aforementioned AVG. If you prefer, we are happy to further inform you about the details of our personal data protection measures.

Your Rights

You are entitled to inspection, rectification, or removal of any personal data you have submitted to us (barring any situation where such may interfere with possible legal obligations). Moreover, you are entitled to object to the processing of your personal data (or parts thereof), either by us or by any of our processors. In addition, you are entitled to have us transfer your submitted personal data to you or to other third parties if you so prefer.

Incidents Involving Personal Data

In the event of any incidents (so-called data leaks) pertaining to the personal data concerned, we will immediately inform you of such event, barring substantial reasons to act otherwise, if there is any concrete chance of incurring negative consequences for your privacy or the realisation thereof. We

make every effort to do so within 48 hours of detecting such data leaks, or of being informed of such data leaks by our (sub)processors.

Complaints

Should you have any complaints about the processing of your personal data, we request you to contact us on the matter. If such should not lead to a satisfactory solution, you are always entitled to file a complaint with the Dutch Personal Data Authority (*Autoriteit Persoonegevens*); the governing body responsible for privacy issues in the Netherlands.

Processing Within The EEA

We shall only process personal data within the European Economic Area (EEA), except when you agree otherwise with us in writing on such matters. Exceptions to this clause include situations in which we wish to map contact moments through our website and/or social media pages (such as Facebook and LinkedIn). Examples include visitor numbers and requested web pages. Your data will be stored by third parties outside of the EU when Google Analytics, LinkedIn, or Facebook are used. These parties are 'EU-US Privacy Shield'-certified, as a result of which they must adhere to European privacy regulations. We would like to stress that such storage only concerns a limited set of sensitive personal data, specifically including your IP address.

Amendments

Inevitably, our privacy policy may be subject to future amendments. Logically, the most recent version of our Privacy Statement shall be the applicable version, which can be found on our website.

In Closing

By the present Privacy Statement, we hope to provide you with a clear overview of our privacy policy. Please do not hesitate to contact us should you have any further questions about how we handle personal data. Contact us at info@supmedi.com for further information about privacy aspects.
