

Disclosure Statement – (Privacy Statement)

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HFDP B.V. herein referred to as “Onlinebedrijfswaardering.nl”, “We”, “Us” or “Our” operates the OnlineBedrijfsWaardering.nl valuation platform (hereinafter referred to as the “Service”).

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms of Service, accessible from the footer of our website.

Information Collection and Use

In connection with the providing and improvement of our service offering (“**Our Service Offering**”) to you and/or your employer (“**You**”), we collect several different types of information (“**Information**”) for various purposes.

1. Types of Data Collected

a. Personal Data

While using our Service Offering, we may ask You to provide us with certain personally identifiable information that can be used to contact or identify You (“**Personalized Data**”). Personalized Data may include, but is not limited to either one or more of the following:

- **Information for invoicing and payment;**
- To maintain your account with us;
- Contact details including name, telephone numbers, email address and postal address. To respond to correspondence and enquiries you send us. In some cases, to gather information needed to provide products and services requested by You. To request your feedback regarding our products and services;
- User credentials including name, email address and personal information You provide to us in a profile, IP address. To set up and maintain your user account. To monitor and enforce if necessary compliance with our contractual terms;
- Employer and employment information such as job title, function, seniority, department, and the address/country/ city of your office. To manage your user account;
- Your preferences and interests, for instance which newsletters You would like to be subscribed to or what markets You are interested in. To enable us to send You tailored information on our products and services across our business units that may be of interest to You;
- We may use your Personalized Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt out of receiving any, or all, of these communications from us by contacting us.

b. User’s Data

We may also collect information on how the Service Offering is accessed and used (“**User’s Data**”). This User’s Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service Offering that You visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

c. Tracking & Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service Offering and we hold certain Information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies such as beacons, tags and scripts are also used to collect and track information and to improve and analyze our Service Offering.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if You do not accept cookies, You may not be able to use some portions of our Service Offering.

Examples of Cookies we use:

- *Session Cookies.* We may use Session Cookies to operate our Service Offering;
- *Preference Cookies.* We may use Preference Cookies to remember your preferences and various settings;
- *Security Cookies.* We may use Security Cookies for security purposes.

2. Use of Data

We use the collected data for various purposes:

- To provide and maintain our Service Offering;
- To notify You about changes to our Service Offering;
- To allow You to participate in interactive features of our Service Offering when You choose to do so;
- To provide customer support;
- To gather analysis or valuable information so that we can improve our Service Offering;
- To monitor the usage of our Service Offering;
- To detect, prevent and address technical issues;
- To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that You have already purchased or enquired about unless You have opted not to receive such information.

3. GDPR Compliance

If You are from the European Economic Area (EEA), our legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personalized Data we collect and the specific context in which we collect it.

We may process your Personalized Data because:

- We need to perform a contract with You;
- You have given us permission to do so;
- The processing is in our legitimate interests and it is not overridden by your rights;
- To comply with the law.

4. Retention of Data

We will retain your Personalized Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personalized Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

We will also retain User's Data for internal analysis purposes. User's Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service Offering, or we are legally obligated to retain this data for longer periods.

5. Transfer of Data

Your information, including Personalized Data, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personalized Data will take place to another organization or country unless there are adequate controls in place including the security of your data and other personal information.

6. Disclosure of Data

Business Transaction

If we are involved in a merger, acquisition or asset sale, your Personalized Data may be transferred. We will provide notice before your Personalized Data is transferred and becomes subject to a different Privacy Policy.

Disclosure for Law Enforcement

Under certain circumstances, we may be required to disclose your Personalized Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Legal Requirements

We may disclose your Personalized Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of us;
- To prevent or investigate possible wrongdoing in connection with the Service Offering;
- To protect the personal safety of users of the Service Offering or the public;
- To protect against legal liability.

7. Newsletter

You can subscribe to our newsletter via our website if and to the extent such newsletter will be issued by us. For this purpose we need your email address and your declaration that You agree to receive the newsletter.

In order to provide you with targeted information, we also collect and process information voluntarily given on preferences, name, address and telephone number .

You can cancel the subscription to the newsletter, as the case may be, at any time. We will immediately delete your data in connection with the newsletter dispatch. This revocation shall not affect the legality of the processing effected on the basis of the consent until the revocation.

8. Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personalized Data, we cannot guarantee its absolute security.

Please be aware that if You disclose personal information on website message boards or chat areas, that information may be collected and used by third parties without our knowledge and may result in unsolicited communications from third parties. Such activities are beyond our control.

9. Data Protection Rights

If You are a resident of the European Economic Area (EEA), You have certain data protection rights. We aim to take reasonable steps to allow You to correct, amend, delete or limit the use of your Personalized Data.

If you wish to be informed about what Personalized Data we hold about You and if You want it to be removed from our systems, please contact us.

In certain circumstances, You have the following data protection rights:

- The right to access, update or delete the information we have on You. Whenever made possible, You can access, update or request deletion of your;
- Personalized Data directly within your account settings section. If You are unable to perform these actions yourself, please contact us to assist You;
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
- The right to object. You have the right to object to our processing of your Personalized Data;
- The right of restriction. You have the right to request that we restrict the processing of your personal information;
- The right to data portability. You have the right to be provided with a copy of the information we have on You in a structured, machine-readable and commonly used format;

- The right to withdraw consent. You also have the right to withdraw your consent at any time where we relied on your consent to process your personal information;
- Please note that we may ask You to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

10. Service Providers

We may employ third party companies and individuals to facilitate our Service Offering ("**Service Offering Providers**"), provide the Service Offering on our behalf, perform Service-related services or assist us in analyzing how our Service Offering is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Cookies are used that allow an analysis of the use of the website by your users. The information generated thereby is transferred to the server of the provider and stored there.

You can prevent this by setting up your browser so that no cookies are stored.

Analytics

We may use third-party Service Offering Providers to monitor and analyze the use of our Service.

Google Analytics

We have integrated the component Google Analytics (with anonymization function) on our website.

Google Analytics is a web analytics service. Web analysis is the gathering, collection and analysis of data about the behavior of visitors to websites. Among other things, a web analysis service collects data on which website a data subject has come to a website from (so-called referrers), which subpages of the website were accessed or how often and for which period of time a subpage was viewed. A web analysis is mainly used to optimize a website and for the cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Google Analytics uses cookies. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. Google might transfer the personal information collected via this technical procedure to third parties.

You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if You do this, You may not be able to use all the features of this website to the fullest extent possible.

In addition, You may prevent the collection of the data generated by the cookie and related to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

This browser add-on informs Google Analytics via JavaScript that no data and information about website visits may be transmitted to Google Analytics.

In addition, a cookie already set by Google Analytics can be deleted at any time via the Internet browser or other software programs.

Further information and Google's applicable privacy regulations can be found at <https://policies.google.com/privacy?hl=en> and <https://marketingplatform.google.com/about/>. The following link provides a further explanation of Google Analytics <https://marketingplatform.google.com/about/>

Our website also uses Google Analytics performance reports relating to demographics and interests and reports on Google Display Network impressions. You can disable Google Analytics for display advertising and customize the ads on the Google Display Network by visiting the ad settings at this link: <https://adssettings.google.com>

11. Links to Other Sites

Our Service Offering may contain links to other sites that are not operated by us. If You click a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

12. Children's Privacy

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personalized Data, please contact us. If we become aware that we have collected Personalized Data from children without verification of parental consent, we take steps to remove that information from our servers.

13. Changes to This Privacy Policy

We will let You know via email and/or a prominent notice on our Service Offering, prior to the change becoming effective and update the date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If You have any questions about this Privacy Policy, please contact us. If You contact us by using the form on our website or by e-mail, your details will be stored with us to process the request and in case of follow-up questions. We will not share this information without your consent.

Definitions

Data Controller

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personalized Data.

Data Processors (or Service Providers)

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Offering Providers in order to process your data more effectively.

Data Subject (or User)

Data Subject is any living individual who is using our Service Offering and is the subject of Personalized Data