

## Privacy Statement

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Solvinity (hereinafter referred to as: 'we') processes personal data of its customers, prospects and other contact persons. We do this to help our customers as best as we can and to achieve our objectives. In this privacy statement, we explain why and in which way we process your personal data.

Martin Maas is our Data Protection Officer (DPO). We would be happy to answer your questions. In order to do this, please contact us via [dpo@solvinity.com](mailto:dpo@solvinity.com) or on +31 (0)20 364 36 00.

### Who are we?

We are Solvinity: IT service provider. This privacy statement applies to all our processing.

### Which personal data do we process?

First name and surname, address, place of residence, telephone number, gender, email address, job title, organisation, IP address, contact history, cookie ID (you can read more about cookies in our [cookie policy](#)) and surfing behaviour (on our websites).

### Why do we process that personal data?

- Customer administration and service provision

We use our customer administration to keep track of which organisations are customers of Solvinity, including the relevant contact persons. We keep track of various personal data of contact persons to be able to optimally provide our services. For example, we keep contact details to be able to reach you, we keep areas of interest in order to provide you with information as best as possible and we process personal data for our market research.

You can reach us through various channels: telephone, post, email, Twitter, LinkedIn and Facebook, among others. In order to make that possible, we process personal data as well.

- Newsletters and mailings

You can subscribe for various newsletters, sometimes personalised and sometimes not. If you no longer wish to receive newsletters, you can unsubscribe in every email.

### Disclaimer

The information in this document may only be used by the client to assess and evaluate the services. We refer the client to the provisions in the section entitled 'Further Provisions' of this document. Copyright © 2017, Solvinity B.V.

- Recruitment (Marketing)

In order to achieve our objectives, we recruit new prospects, customers and colleagues. In order to be able to keep in touch with everybody, we also process their contact details and areas of interest.

We also process personal data for Solvinity campaigns (and Solvinity-related campaigns, such as our IT Experiences events). For example, IP addresses, cookie ID, social ID and surfing behaviour. We do this to be able to show the most relevant advertisements in the right places and to be able to measure the success of our campaigns.

Also, we use 'adapted target groups' via social media platforms for Solvinity campaigns (and Solvinity-related campaigns). We do this via Facebook, Twitter and LinkedIn targeting. It is possible that (personalised) advertisements are displayed on these platforms. For this purpose, we do not pass on personal data to third parties unless you have provided unequivocal permission to do so.

If you do not want advertisements to be displayed via these platforms, you can unsubscribe to this via these platforms. On the following pages, you can read how to do this:

[Facebook](#)

[LinkedIn](#)

[Twitter](#)

Please note: it is still possible that you will be presented with Solvinity advertisements if you belong to a general target group that we target with our advertisement.

- Improvement of Solvinity service provision

We also keep track of data for the purpose of improving our service provision, for example click behaviour on the website in order to analyse which articles are most read and open rates to see whether our newsletters are relevant. We do this as anonymously as possible. For example, we do not provide third parties with personal data in this case either, unless you have given unequivocal permission to do so.

- Special data

We process one type of special data, namely ethnicity (photos and videos). We make use of photos and videos to provide more atmosphere to this content and to show, for example, how customers, partners and employees experience their collaboration with us.

## **Rights of data subjects**

Pursuant to the AVG, everybody has a number of rights. We do our utmost to comply with these as best as we can. Do you have any tips or comments? Please let us know! In order to make use of your rights, please contact us via [dpo@solvinity.com](mailto:dpo@solvinity.com) or on +31 (0)20 364 36 00.

- **Information and inspection:** Of course, you can inspect which of your personal data we process. We would be delighted to tell you more about how and why we process that data.

- **Rectification:** Do you think that we are using incorrect data of yours? Please let us know and we will amend this.
- **Oblivion:** You can delete your personal data that we keep. It may be the case that we must process this data for other purposes (such as administration or to eliminate double entries).
- **Limitation:** If you feel that we are processing your personal data unlawfully or incorrectly, you can have this processing limited as well.
- **Objection (opposition):** you can submit an objection in relation to the processing of your personal data. Does it concern marketing? In that case, we will terminate the processing as soon as possible.
- **Transferability:** This is a new right under the AVG to transfer your personal data or have it transferred. If you want to make use of this right, please contact us.

In addition, you can also:

- **Revoke permission:** for instance, with regard to receiving electronic mailings. If you want to revoke your permission for another type of processing, please contact us.
- **File a complaint with the Dutch Data Protection Authority (Dutch DPA):** Do you think that we are not acting in accordance with privacy legislation? Of course, we would like to hear about that. As of 25 May 2018, you can also file a complaint about this with the Dutch DPA. Currently, you can only tip the Dutch DPA via [this form](#).

### Retention periods

We do not retain personal data any longer than necessary.

### Principles of the processing activities

As explained above, we process some data for the purpose of complying with a statutory obligation, some we process for executing an agreement (customers, partners or events), but most data we process for the execution of the justifiable interest of Solvinity: the execution of our objectives. If you want to know more about our considerations in determining justifiable interest, please contact us. Finally, we process some data with your permission: this particularly entails online tracking methods and sending newsletters.

### Third-party recipients

We engage service providers for the execution of some elements of our service provision. These are not 'third-party recipients' but processors. We collaborate, for example, with a marketing bureau, a PR bureau and a telemarketing bureau, and we make use of Google Analytics, Microsoft Dynamics CRM and Recrutee. These parties process personal data in agreement with the Solvinity assignment.

Sometimes we are legally obliged to provide personal data to third parties, such as the Dutch Tax and Customs Administration. In addition, we will only provide third parties with data if we have received your permission to do so.

### Security measures

The security measures are defined in accordance with the ISO 27001 certification with regard to all aspects of information security:

- Policy-related (management involvement);
- Organisational (responsibilities);
- Business assets (infrastructure, network, systems and other business assets);
- Staff (house rules, mistakes, theft, fraud, abuse);
- Physical (locks, fire protection);
- Communication and operation (management systems, processes and procedures);
- Access control (password, biometrics, etc.);
- System and software development and maintenance (documentation, processes);
- Continuity (emergency services);
- Regulations (e.g. AVG, Computer Crime Law).

### **Links**

The Solvinity website contains a number of links to other organisations' websites. Solvinity does not accept any responsibility for the way in which these parties process personal data. You can read the privacy statement of the organisation in question to learn more about that.