

## Privacy Statement Notarieel Betalen B.V.

The effective date of this Privacy Statement is 25 May 2018.

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Protection and observance of the personal privacy of its stakeholders (such as employees, clients, accounts receivable and other relations) are essential to Notarieel Betalen B.V. (“Notarieel Betalen”). Personal data is handled with the utmost care.

### What is personal data?

Personal data is all data that can be traced back to a person, a so-called data subject. Examples are your name, address, telephone number and bank account number. Sometimes we aggregate or anonymise your personal data, so that you are no longer traceable as a person. A data subject can be a client, an employee or another person whose personal data are processed.

We are unable to conduct our business activities without processing certain personal data. We believe it is vital that the processing of personal data takes place in a manner that is consistent with the existing safeguards for the protection of privacy. We observe the existing statutory rules for the protection of personal data, i.e. the General Data Protection Regulation, hereinafter referred to as “GDPR”.

Notarieel Betalen observes the requirements of the GDPR in all cases.

### From which sources do we collect personal data?

Notarieel Betalen uses a variety of sources to collect personal data. The public sources from which Notarieel Betalen can obtain personal data include:

- a) company websites, and public registers such as the trade register, land registry, the annual accounts system of the Chamber of Commerce, insolvency register, register of receivers and debt-restructuring register;
- (b) registers for verification and identification of public documents;
- c) entries in the Government Gazette and daily and weekly newspapers, and other sources that are publicly accessible, such as the data already provided by the person concerned or data that has been made public through their actions on social networks or other media;
- d) foreign equivalents of the sources mentioned under (a) to (c).

The non-public sources from which Notarieel Betalen can obtain personal data include:

- (a) the data subject himself, including those representing the data subject and those authorised by the data subject;
- b) clients of Notarieel Betalen and others who have a business or financial relationship (including an employment relationship) with us that is relevant for the purpose of collecting and processing data;
- c) commercial parties and companies with which Notarieel Betalen does business.

Distinction between controller and processor

Where our client determines the objectives and the means of data processing of the personal data of its accounts receivable, our client is the controller of his own personal data. If agreed in writing, Notarieel Betalen will process such personal data on behalf of its client as a processor. As a processor, Notarieel Betalen will ensure to the best of its ability any appropriate technical and organisational measures to protect the personal data against loss or against any form of unlawful processing.

In this Privacy Statement, Notarieel Betalen informs you about how Notarieel Betalen as a processor deals with your personal data. Notarieel Betalen is the controller when processing personal data for the purposes such as:

- credit management
- risk and compliance
- marketing information

### **Distinction between personal data and anonymous data**

Notarieel Betalen makes a distinction between personal data and anonymous data.

Personal data is the data pursuant to which your identity can be traced, such as your name, address, e-mail address, telephone number and age. Notarieel Betalen can have access to your personal data in various ways. In the first place, you may have provided such personal data via this website or otherwise. In addition, Notarieel Betalen may have obtained your personal data from its clients or from data suppliers.

Anonymous data is data that cannot (no longer) be traced back to your identity. An important and common example of anonymous data is the IP address. When you visit our website, the collection of certain information is required in order for the connection to proceed smoothly. When you request a web page, it is necessary for the web server to know where the page should go. Your IP address will be used for this. This is a number sequence that is automatically assigned to your computer by your internet provider every time you log in to the internet, so that your computer can be identified.

In addition, Notarieel Betalen uses a service to collect statistics about your visit to our website and Notarieel Betalen also uses this data in an anonymous form to further develop and improve its services.

The statistics are reported on an aggregated company level and not on the level of the individual visitor. With respect to the processing of any personal data, Notarieel Betalen receives from the visitor's browser the data that the browser sends along with the so-called http request (including the IP address) and in addition the domain names, company names and business contact details are processed by Notarieel Betalen.

### **For what purposes does Notarieel Betalen use your personal data?**

We process personal data in order to:

conduct the management of funds and contracts for our clients:

pursuant to submitted invoices, company and personal data, payments received, debited payments, links with business records and identification of (legal) persons, to create a database to be able to perform our services.

Notarieel Betalen processes the personal data solely for the above-mentioned purposes, which are also registered with the AP or, where applicable, with its data protection officer (dpo). Notarieel Betalen can provide the data to third parties that are involved in the processing and execution of the stated objectives. Notarieel Betalen has entered into processor agreements with such third parties.

In addition, Notarieel Betalen may, where permitted on the basis of the applicable national regulations, exchange the personal data with affiliated companies, and other organisations, which may also be located outside the EEA (European Economic Area), for the purposes as stated in this Privacy Statement.

On what legitimate grounds does Notarieel Betalen process personal data?

Consent: The data subject has given his or her unambiguous consent to the processing. If you, as a data subject on the website of Notarieel Betalen, fill in contact forms to request information, you must state your personal details, such as your name, company, e-mail address and telephone number. Notarieel Betalen uses

this information only for the purpose for which it is intended: to provide you with the requested service and to provide information. Your personal information will not be provided to third parties.

Agreement: The data processing is necessary for the execution of an agreement in which the data subject is a party. This criterion applies when the processing is required for the execution of an agreement, such as an employment contract, purchase agreement or rental agreement.

Legal obligation: Data processing is necessary to comply with a legal obligations which Notarieel Betalen is subjected to.

Legitimate interest: Processing personal data for the purpose of offering and supplying information, as well as the development of these services, is necessary in view of the legitimate interest of Notarieel Betalen or its client. The purpose of such processing is to enable companies to manage their financial risks, to protect themselves against fraud, to know with whom they will be doing business, to comply with compliance and regulatory obligations and to gain a better insight into organisations, sectors and markets. Personal data on these grounds is not processed if the interests of the person whose data is processed take precedence.

### **Does Notarieel Betalen share personal data with other parties?**

Notarieel Betalen does not share internal marketing data, including personal data, with anybody outside the company. Marketing data is shared within the company.

Notarieel Betalen's core activity is the provision of software for the management of accounts receivable of organisations. Notarieel Betalen can also analyse and qualify the data held by clients of Notarieel Betalen.

Notarieel Betalen shares such (commercial) data with:

- a) clients - companies and organisations which Notarieel Betalen enters into an agreement with to buy data or to obtain access thereto;
- b) entities within Notarieel Betalen;
- c) suppliers - companies and organisations which Notarieel Betalen enters into an agreement with to buy data or to obtain access thereto.

### **Security of personal data**

Notarieel Betalen observes utmost care with regard to personal data and, together with possible processors, ensures the appropriate organisational and technical security of its files in which the personal data is stored. In this way we make sure that this data is only accessible to persons who is authorised for access to such data by virtue of their duties and that the data is only used for the purposes for which it was obtained.

How long does Notarieel Betalen retain my data?

Notarieel Betalen ensures that the personal data processed by Notarieel Betalen for its accounts-receivable management services is accurate, adequate, relevant and up-to-date. Notarieel Betalen takes all reasonable measures necessary to remove the personal data if it appears that the aforementioned processing purposes are incorrect or no longer adequate, relevant or up-to-date.

### **External links**

This website may contain links to other websites. We are not responsible for the privacy policy or the content of such other websites. We advise you to take note of the privacy statements on the relevant websites.

## **Rights with regard to the processing of personal data**

Apart from (statutory) exceptions, Notarieel Betalen informs the data subject whether certain data is processed and will cooperate with the request to improve or supplement such data.

Access, correction, removal, objection to processing

Requests for inspection, restriction of processing, data portability, correction or removal of your own personal data, as well as an objection to the processing of your personal data can be submitted in writing to the address below of Notarieel Betalen, stating Access to Personal Data, and with a copy of a valid proof of identity (with the Citizen Service Number and photo covered with tape) enclosed. Furthermore, the applicant must state his private postal address and the file number as well as his signature. If the request is fulfilled, a complete overview of the personal data concerned in the processing operations that have been notified will be provided within four weeks. If Notarieel Betalen has met a request to improve or supplement data, it shall notify third parties to whom this information has been provided of the changes made. Notarieel Betalen does not have to comply with the request if this is impossible or requires a disproportionate effort.

Change of privacy statement

We can change this Privacy Statement at any time with or without notice. We therefore advise you to consult this Privacy Statement from time to time to ensure you are aware of any changes to this Privacy Statement.

## **Questions, comments or complaints**

If you have questions that are not answered in this Privacy Statement, when you have suggestions or comments about its contents, or when you want to view or change your personal data, or have complaints about the way in which Notarieel Betalen has handled your personal data, please check our website for additional information, or let us know by e-mail at the address [support@Notarieel Betalen.nl](mailto:support@NotarieelBetalen.nl) or by post Notarieel Betalen BV, Attn: Support Department, Radonweg 1, 3542 AN in Utrecht mention of 'Privacy'. This will help Notarieel Betalen to make sure that problems or concerns will be resolved.

You are also free to submit a complaint to the Dutch Data Protection Authority if you believe that Notarieel Betalen is infringing any applicable laws and regulations.