

# **PRIVACY STATEMENT**

Trasegro b.v. is registered at the Chamber of Commerce under 56536194 General Trading Conditions of Trasegro b.v. are deposed at FENEX Amsterdam



# 1. Privacy policy

The website of Trasegro b.v, <u>www.trasegro.com</u> and related internet services are provided by Trasegro b.v., Emmerblok 18, 4751 XE Oud Gastel, The Netherlands and registered at the Chamber of Commerce with registration number 56536194.

In accordance with the General Data Protection Regulations we have implemented following procedures.

Trasegro b.v., guarantees within its possibilities, the protection of the privacy of employees, business partners and visitors of our website. This means that we demand maximum effort of our co-partners in order to guarantee a correct implementation of the General Data Protection Regulations. All data as collected will be saved at a Secured Server. In the next sections we inform you about the data we store and use within the legal framework of the GDPR and additional Directives. We also inform you about how to act in case you like to receive more information or clarification about this subject.

# 2. Legal Framework; The processing of personal data.

In case you use the website of Trasegro b.v, it is possible that you provide us certain personal data, either on our request or on your own initiative.

Trasegro b.v. will process this information in order to meet your request to receive company- or product information as well as to optimize the website. Trasegro collects and saves only the minimum of information as needed to meet your request. In those cases we ask you specific for certain personal information it will be mentioned on the specific webpage.

Trasegro b.v. is responsible for processing the personal data of its employees. There is a legal commitment to disclose personal specific data to external stakeholders f.e. payroll processor and tax authorities. In the GDPR the external stakeholder will be defined as an independent Processor or Sub-Processor.

Filing of the data is based on legal requirements and deadlines as described in the relevant Directives and Standards, unless by mutual agreement or for other important reasons, (parts) of the files will extend these legal deadlines.

#### Recruitment

When the company receives, in case of a recruitment process, personal information, this information will only be used in relation to this case: the recruitment process, communication with the job applicant and assessment of suitability.

The personal information of the job applicant will not be stored any longer than 4 weeks after closing the recruitment process, unless agreed differently.

#### 3. Legal Framework; the processing of (critical) companies data.

The Company register in case of enquiries, orders and contracts name – address – residence – contact person – phone number - email address – Chamber of Commerce registration (Companies House) and IBAN number, necessary to carry out the agreed assignment. We only register the necessary information and based on the permission being granted to execute the order/contract.

Name – address – residence – contact person – phone number - email address can be submitted to third parties in case this is necessary to execute the contract (f.e. parts delivery from a central warehouse) Providing this data will be restricted to the specific order and are not allowed for other purposes.

In order to start an assessment on enquiries and contracts we need, if applicable, detailed information of the location and photographic footage in order to estimate the contracts profile.

The information as collected will be saved on our secured servers at customers level and only accessible to our employees and partners who are dealing with the project. Access is given by individual users names and passwords.

The information as collected will not be shared with external stakeholders.

In case of termination of the agreement or contract Trasegro b.v. will delete/destroy all information Trasegro b.v. which has within its possession within 6 months after termination of the agreement/contract. All personal data and critical companies data will be removed, unless legal requirements prohibit us to do so. In that case Trasegro b.v. secure the data according to legal guidelines and within its possibilities. When the legal regulations permit to do so the information as saved will be destroyed. In case of mutual agreement data can be saved more than 6 months but never exceed Legal requirements or deadlines.

Companies data can be used to inform customers about new developments, products and services of Trasegro b.v. and its co-partners. Trasegro b.v. will respect customers preferences. In case you do not like to be informed on



new products or services you can share this with <u>sjoerd.groffen@trasegro.com</u> citing "Address registration". Trasegro b.v. will then freeze your contact details.

Trasegro b.v. concludes order processing agreements with stakeholders as client – processor and sub-processor related to data-processing, data-storage, data-security. This to support the business processes. Trasegro b.v. commits itself to legal requirements and deadlines for saving information.

# 4. Right to inspect, correct or delete your personal data.

You have the right to inspect, correct or delete your personal data which we have collected and saved on our servers. If you like to correct or delete your information as stored at our servers we ask you to put your request in writing and post it to the address below or email it to <u>sjoerd.groffen@trasegro.com</u>

To avoid any misuse we will ask you to identify yourself by sending us a copy of your passport or ID and a copy of the latest utility bill. Trasegro b.v. will deal with your request within 7 working days unless there are important reasons such as legal requirements not to do so.

# 5. Register of Processing

Trasegro b.v. is using a Processing Register to secure all activities

You are entitled to have full access to our Register of Processing. To avoid any misuse we will ask you to identify yourself. Part of our Privacy Policy is to keep records of our processing partners. Current laws and regulations are part of the selection procedures of our partners, processors and sub-processors.

# 6. Privacy by design

At the stage of developing our products and services we try, within reason, to safeguard the privacy of the data we process. Access codes, encryption, anonymization, data minimysation, pseudomisation can be part of data security process.

# 7. Breach of data security / Data Register

In case of a (potential) breach of the data security Trasegro b.v. will act according to the Regulation EU 2016/679 and contact the local authorities (Autoriteit Persoonsgegevens) and if needed the persons involved. The data security process is part of our ISO 9001 Management system. Trasegro b.v. will record all obstructions that take place on data security in a Data Register.

#### 8. Privacy policy of other websites

At our website <u>www.trasegro.com</u> are links to other websites. Trasegro b.v. cannot take any responsibility on the privacy policy and the contents of these websites. More information on this can be obtained from the specific websites.

#### 9 Cookie Policy

This site uses cookies – small text files that are placed on your computer to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information, create a better performance of the website itself and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser.

#### . 10. Google Analytics

Our website is using Google Analytics, a web analyse-service offered by Google Inc. Google Analytics uses cookies – small text files that are placed on your computer- to help the site provide a better user experience. This collected information (incl. your IP address) will be stored at Google servers which are located in the United States. Google uses this information to record the way the website is used, reports to other providers and stakeholders related to website activities and in general the use of internet. Google will not link your IP address with other (personal) data.

If you may prefer to disable cookies on this site and on others, the most effective way to do this is to disable cookies in your browser.

#### 11. Session cookies



Session cookies are only active during your visit to our website and will be automatically removed from your device if you close your browser. We record which categories of our website/services you have visited and optimize our services based on this information.

#### 12. Google Analytics cookies

Through our website Google will use cookies as part of their 'Analytic-Services'. This service is used to analyse the way you use our website. Based on this information we can optimize our website. The information that is collected is only based on activities as taken place and not on visitors personal data.

# 13. Social media cookies

On our website you will find buttons which can be used to promote our information or webpages on social media by f.e. 'liken' at Facebook or a 'tweet' at Twitter. These buttons are activated by special codes that are installed by the social media platforms. Through these codes cookies are activated. This happens beyond our influence. The privacy statement of the social media platforms itself will inform you what the intention and purpose of these cookies are and how they will use the information as collected.

#### 14. Activate and remove cookies

By using the 'help' function of your browser information on how to activate, de-activate or remove cookies can be found.

More information about cookies policy can be found at <u>www.AboutCookies.org</u>.

#### 15. Amendments

Trasegro b.v. reserves the right to change the privacy policy at any time. At our website you will always find the latest version.

#### 16. General

For those who have no access to our website we will supply a copy of our privacy statement at their first request. Are there still questions about our privacy policy or you want access to your personal data, change or delete personal information? Please contact us by sending an email to info@trasegro.com

#### 17. Contact details

Company; GDPR/AVG contact address postal code place	Trasegro b.v. Mr. S. Groffen Emmerblok 18 4751 XE Oud Gastel The Netherlands
Tel:	0031 (0)165 518 940
@:	sjoerd.groffen@trasegro.com
W:	www.trasegro.com