

DATA PRIVACY POLICY

This privacy statement is effective as of May 25th, 2018. Please note that this privacy statement may be updated to reflect any changes in the way we handle your personal data or any changes in applicable laws. This policy will tell you everything you need to know about how Vryhof and/or its affiliates ("Vryhof"; "we") protect the personal data we process and control relating to you ("your personal data"; "your data") and which rights you have in relation to the processing of your personal data.

Further information on Vryhof can be found [here](#). Any Vryhof entity located outside the European Union will for the purposes of compliance with data privacy laws be represented by Vryhof in the Netherlands. Below, we first give a general description of how Vryhof protects your personal data. Further below, we also include specific information on the following:

How do we use personal data when you visit Vryhof's website?

How do we use cookies (and other tracking technologies)?

How do we use personal data for marketing purposes?

DATA PRIVACY POLICY

HOW DOES VRYHOF PROTECT YOUR PERSONAL DATA?

Vryhof attaches great importance to your right to privacy and the protection of your personal data. We want you to feel secure that when you deal with us, your personal data are in good hands.

Vryhof protects your personal data in accordance with applicable laws and our data privacy policies. In addition, Vryhof maintains the appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto.

- The following sections provide further details as to how Vryhof processes your personal data:
- Which categories of personal data do we collect and how do we process such personal data?
- For which purposes and on which legal basis do we use your personal data?
- Will we share your personal data with third parties?
- What about sensitive data?
- What about data security?

Which categories of personal data do we collect and how do we process such personal data?

We collect personal data of our employees, potential employees, clients, suppliers, business contacts, shareholders and website users. If the data we collect are not listed in this privacy statement, we will give individuals (when required by law) appropriate notice of which other data will be collected and how they will be used.

Specifically, the personal data we collect include the categories of personal data described in the sections "How do we use personal data when you visit Vryhof's website?", "How do we use cookies (and other tracking technologies)?", "How do we use personal data when you visit our offices?" and "How do we use personal data for marketing purposes?", as well as any other categories of personal data referred to in this privacy statement or in other statements you have received.

Except for certain information that is required by law, your decision to provide any personal data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal data. However, please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy statement, and you may not be able to use certain tools and systems which require the use of such personal data.

If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this privacy statement and that the person has given you his/her consent for sharing the information with Vryhof.

The above-mentioned categories of personal data have been obtained either directly from you (for example, when you provide information to sign up for a newsletter or register to comment on a forum website) or indirectly from certain third parties (for example, through our website's technology). Such third parties include our affiliates, public authorities, public websites and social media, suppliers and vendors.

DATA PRIVACY POLICY

Purpose	Legal Basis
Managing our contractual and/or employment relationship with you.	Necessary for the performance of a contract to which you are a party.
Recruitment.	Justified on the basis of our legitimate interests for ensuring that we recruit the appropriate employees.
Facilitating communication with you (including incase of emergencies, and to provide you with requested information).	Justified on the basis of our legitimate interests for ensuring proper communication and emergency handling within the organization.
Operating and managing our business operations.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Complying with legal requirements.	Necessary for the compliance with a legal obligation to which we are subject.
Monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use).	Justified on the basis of our legitimate interests of avoiding non-compliance and protecting our reputation.
Improving the security and functioning of our website, networks and information.	Justified on the basis of our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.
Undertaking data analytics, i.e. applying analytics business operations and data to describe, predict improve business performance within Vryhof and/or to provide a better user experience. (more details on how we run analytics on our website can be found in our cookies policy).	Justified on the basis of our legitimate interests for to ensuring the proper functioning of our business and operations.
Marketing our products and services to you (unless you objected against such processing, as further described in the section "How do we use personal data for marketing purposes?" below).	Justified on the basis of our legitimate interests for ensuring that we can conduct and increase our business.

Where the above table states that we rely on our legitimate interests for a given purpose, we are of the opinion that our legitimate interests are not overridden by your interests, rights or freedoms, given (i) the transparency we provide on the processing activity, (ii) our privacy by design approach, (iii) our regular privacy reviews and (iv) the rights you have in relation to the processing activity. Please contact us if you wish to obtain further information on this balancing test approach.

We will process your personal data for the purposes mentioned above based on your prior consent, to the extent such consent is mandatory under applicable laws.

We will not use your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

DATA PRIVACY POLICY

Will we share your personal data with third parties?

We may transfer personal data to our service providers, professional advisors, public and governmental authorities or third parties in connection with a (potential) corporate or commercial transaction. Such third parties may be located in other countries. Before we do so, we shall take the necessary steps to ensure that your personal data will be given adequate protection as required by relevant data privacy laws and Vryhof's internal policies.

Unless you are otherwise notified, any transfers of your personal data from within the European Economic Area (EEA) to third parties outside the EEA will be based on an adequacy decision or are governed by the standard contractual clauses (a copy of which can be obtained through the contact information included below). Any other non-EEA related transfers of your personal data, will take place in accordance with the appropriate international data transfer mechanisms and standards.

What about sensitive data?

We do not generally seek to collect sensitive data (also known as special categories). In the limited cases where we do seek to collect such data, we will do this in accordance with data privacy law requirements and/or ask for your consent.

The term "sensitive data" refers to the various categories of personal data identified by data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent from you. These categories include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences (including information about suspected criminal activities).

What about data security?

We maintain organizational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

Regarding your use of our websites, you should understand that the open nature of the internet is such that information and personal data flows over networks connecting you to our systems without security measures and may be accessed and used by people other than those for whom the data are intended.

Where will your personal data be processed?

- As a global organization with offices and operations throughout the world, personal data we collect may be transferred or be accessible internationally throughout Vryhof's global business and between its entities and affiliates.
- Any such transfers throughout Vryhof's global business take place in accordance with the applicable data privacy laws.
- Any Vryhof entity located outside the European Union will for the purposes of compliance with data privacy laws be represented by Vryhof Group.

DATA PRIVACY POLICY

How long will your personal data be retained by us?

We will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain your data for as long as needed in order to comply with our global legal and contractual obligations.

Which rights do you have with respect to the processing of your personal data?

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Vryhof no longer processes your personal data.
- Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal data: this right entitles you to request that Vryhof only processes your personal data in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to Vryhof, or request Vryhof to transmit such personal data to another data controller.
- To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting us. Please note that this will not affect Vryhof's right to process personal data obtained prior to the withdrawal of your consent, or its right to continue parts of the processing based on other legal bases than your consent.
- If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to Vryhof first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against Vryhof with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).
- Contact us to exercise any of your rights.

DATA PRIVACY POLICY

HOW DO WE USE PERSONAL DATA WHEN YOU VISIT VRYHOF'S WEBSITE?

In addition to the information set out above, the following sections describe how we use personal data when you visit Vryhof's websites:

- Which personal data do we gather?
- Do we include (links to) websites and programs of third parties?
- How do we use personal data that we collect from our websites?

Which personal data do we gather?

- Vryhof collects personal data at its websites in two ways: (1) directly (for example, when you provide personal data to sign up for a newsletter or register to comment on a forum website); and (2) indirectly (for example, through our website's technology).
- We may collect and process the following personal data:
- Personal data that you provide by filling in forms on our website. This includes registering to use the website, subscribing to services, newsletters and alerts, registering for a conference or requesting a white paper or further information. Pages that collect this type of personal data may provide further information as to why your personal data are needed and how it will be used. It is completely up to you whether you want to provide it.
- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Any postings, comments or other content that you upload or post to an Vryhof website.
- Our website collects personal data about your computer, including (where available) your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our website, the pages you view and resources you access or download, including but not limited to, traffic data, location data, weblogs and other communication data. Please see the Cookies section below for more information.

Do we include (links to) websites and programs of third parties?

Our websites may include:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.
- We do not accept any responsibility or liability for such third parties' sites or programs. Please check such third parties' terms of use and privacy statements before using and providing any information to such third parties' sites and programs.

DATA PRIVACY POLICY

How do we use personal data that we collect from our websites?

We use personal data for the purposes described in the section "For which purposes and on which legal basis do we use your personal data?" above, as well as to provide you with information you request, process online job applications, and for other purposes which we would describe to you at the point where it is collected. For example:

- To fulfill your requests for white papers, articles, newsletters or other content.
- For surveys or research questionnaires.
- To personalize your experience at our website.
- To contact you for marketing purposes where you have agreed to this.
- We analyze your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and make it more effective. Please see the Cookies section below for more information.

HOW DO WE USE COOKIES (AND OTHER TRACKING TECHNOLOGIES)?

In addition to the information set out above, this section describes how we use cookies and other tracking technologies.

We analyze your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and, eventually, to determine how we can tailor our website to make it a more positive and relevant user experience.

Please see our Cookies policy for more details. By using our website, you agree that we can place cookies and other similar technologies on your device as explained in our Cookies policy.

HOW DO WE USE PERSONAL DATA FOR MARKETING PURPOSES?

In addition to the information set out above, the following sections describe how we use personal data for marketing purposes:

- What are the sources of marketing data?
- Do we send targeted e-mails?
- Do we maintain Customer Relationship Management(CRM) databases?
- Do we combine and analyze personal data?
- Do we share personal data with third parties?
- What are your rights regarding marketing communications?

DATA PRIVACY POLICY

What are the sources of marketing data?

The bulk of the personal data we collect and use for marketing purposes relates to individual employees of our clients and other companies with which we have an existing business relationship. We may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company.

Do we send targeted e-mails?

We send commercial e-mail to individuals at our client or other companies with whom we want to develop or maintain a business relationship in accordance with applicable marketing laws. Our targeted e-mail messages typically include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click. When you click a link in a marketing e-mail you receive from Vryhof, we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

Targeted e-mails from Vryhof may include additional data privacy information, as required by applicable laws.

Do we maintain Customer Relationship Management (CRM) databases?

Like most companies, Vryhof uses customer relationship management (CRM) database technology to manage and track our marketing efforts. Our CRM databases include personal data belonging to individuals at our client and other companies with whom we already have a business relationship or want to develop one. The personal data used for these purposes includes relevant business information, such as: contact data, publicly available information (e.g. board membership, published articles, press releases, your public posts on social media sites if relevant for business purpose), your responses to targeted e-mail (including web activity following links from our e-mails), website activity of registered users of our website, and other business information included by Vryhof professionals based on their personal interactions with you. If you wish to be excluded from our CRM databases, please contact us.

Do we combine and analyze personal data?

We may combine data from publicly available sources, and from our different e-mail, website, and personal interactions with you (this includes information collected across our different websites such as our careers and corporate sites and information collected when you sign-up or log on to our sites or connect to our sites using your social media credentials (such as LinkedIn). We combine this data to better assess your experience with Vryhof and to perform the other activities described throughout our privacy policy.

Do we share personal data with third parties?

In addition to the third parties mentioned in the section "Will we share your personal data with third parties?" above, we may share your personal data with marketing agencies.

A list of these marketing agencies can be requested from communication@vryhof.com

What are your rights regarding marketing communications?

You can exercise your right to prevent marketing communications to you by checking certain boxes on the forms we use to collect your personal data, or by utilizing opt-out mechanisms in e-mails we send to you. You can also exercise the right to discontinue marketing communications to you, or to have your personal data removed from our customer relationship management (CRM) databases at any time by contacting us. In such cases, we will retain minimum personal data to note that you opted out in order to avoid contacting you again.

CONTACT US

Please contact us at communication@vryhof.com if:

You have a general question about how Vryhof protects your personal data.

You wish to exercise your rights in relation to your personal data rights (as set out in the sections "Which rights do you have with respect to the processing of your personal data?" and "Your rights regarding marketing communications").

You wish to make a complaint about Vryhof's use of your data.