

# PRIVACY STATEMENT

HC GROEP B.V.  
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COC 17260502

## 1. GENERAL

### A. PRIVACY

- i. HC Groep B.V. takes your privacy seriously. We process personal data about you, because you use our website, our services and also because you provide this information to us.
- ii. We do our utmost to process the information you have provided in a careful manner. This privacy statement gives you a clear overview of what personal data we process, how we handle your personal data and also explains as clearly as possible why we collect it.
- iii. In the context of the General Data Protection Regulation, HC Groep B.V. is a data controller.

## 2. A SUMMARY OF THE PERSONAL DATA WE PROCESS

### A. FROM YOU AS A VISITOR OF THIS WEBSITE

- i. First and last name
- ii. E-mail address
- iii. Other personal data that you actively provide
- iv. Location
- v. Data about your activities on our website
- vi. IP address
- vii. Type of browser and device

## 3. SENSITIVE PERSONAL DATA WE PROCESS

### A. MINORS

- i. Our website and services do not intend to collect data about visitors who are under the age of 16, with the exception of given permission from parents or guardians. HC Groep B.V. cannot check if a visitor is older than the age of 16, therefore we advise parents to be involved in the online activities of their children. This way, we can prevent data on children from being collected without parental consent.

### B. PLEASE CONTACT US IF WE HAVE DONE SOMETHING WRONG

- i. If you are convinced that we have collected personal data about a minor without the aforementioned consent, please contact us via [privacy@hcgroep.com](mailto:privacy@hcgroep.com). We will delete the data immediately.

## **4. WHY WE NEED YOUR DATA AND FOR HOW LONG**

### **A. HC GROEP B.V. PROCESSES YOUR PERSONAL DATA WITH THE FOLLOWING PURPOSES:**

- i. To be able to e-mail you when this is necessary to provide our services;
- ii. To send you requested information as a result of filling out the contact form and finally;
- iii. To analyse your behaviour on the website in order to improve our website and to adjust it to your preferences.

### **B. THE DURATION FOR WHICH WE STORE YOUR DATA**

- i. HC Groep B.V. will not store your personal data any longer than necessary to achieve the purposes for which your data is collected. When you contact us by e-mail, the data sent with you will be kept for at least 7 years. Data collected by Google Analytics is anonymous and therefore not tied to your personal data, this data is stored indefinitely within Google Analytics. If you would like information about our retention periods in your specific case, please contact: [privacy@hcgroep.com](mailto:privacy@hcgroep.com).

## **5. PROCESSING BY THIRD PARTIES**

- i. Besides the cookies we use, as described in our cookie declaration, we also share the data we collect from you on our website with the following third parties:
  - a. The website and backups of the website are hosted by Combell B.V. Data that you leave on the website is on the servers of Combell B.V. saved.
  - b. The email is hosted with Microsoft Office 365. If you contact us via the forms or by email, those emails will be stored on Microsoft's servers.
  - c. Newsletters are sent with MailChimp. When you sign up for the newsletter, your email address and name are automatically saved in the appropriate list within MailChimp.
- ii. We have made good agreements with the above processors. We force these third parties to use at least the same level of data protection as we offer you as data controller.

## **6. SECURITY AND VERSION**

### **A. SECURITY**

- i. HC Groep B.V. takes the protection of your data very seriously and therefore takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.
- ii. No physical copies of your personal data are made. Your data is only managed in the aforementioned systems and software.
- iii. The personal data managed by HC Groep B.V. or by the aforementioned third parties is only accessible via the above software and is password protected and where possible with two-step verification. In this two-step verification, a code is generated from the software and sent to HC Groep B.V.. This code must be used during the login process.
- iv. The devices that open your data are each also locked with a password and / or encrypted (encrypted). The number of devices that can access your data is limited to only the necessary devices.
- v. To protect you as a website visitor, the website is secured with an SSL certificate. This means that your connection to the website is private. You can recognize this security by the lock before the URL.

### **B. VERSION**

- i. The current version is 20250112

## 7. MAPPING OUT YOUR VISIT OF OUR WEBSITE

### A. COOKIES

- i. A cookie is a small text file that is stored by the browser of your computer, tablet or smartphone when you first visit this website.
- ii. HC Groep B.V. uses different types of cookies:
  - a. Functional cookies: These are cookies with a purely technical functionality. These ensure that the website works properly, so that it can, for example, remember your preferred settings. Using these, we can also optimize our website and the services through our website.
  - b. Analytic cookies by third parties: These cookies can keep track of your online behaviour. These cookies are placed when using analytical service providers, such as Google Analytics.
  - c. Tracking cookies: These cookies are placed by an external party. By reading these cookies the advertiser recognizes you when you visit a site in which he is also involved. If you continue browsing, personalized ads can be shown. These cookies can also keep track of your online behaviour, which may result in a very specific profile being built by these parties. This profile can be so detailed that it is considered personal data.

### B. COOKIE NOTIFICATION AND WHAT TO DO WHEN YOU DON'T LIKE COOKIES

- i. Your cookie settings were set by you on your first visit to our website. All non-functional cookies can be denied per category. Placement of cookies, other than functional or anonymous analytical cookies, takes place only after an active action by you as a visitor. You can change your settings at any time via our website.

## 8. ACCESSING, ADJUSTING OR DELETING YOUR DATA

### A. YOUR RIGHTS

- i. You have the right to
  - a. access your personal data,
  - b. request an adjustment of your data
  - c. request that less of your data be processed by us,
  - d. apply for the removal of your data,
  - e. have your data transferred to someone else and
  - f. file a complaint as described in article 8.
- ii. If you have any questions or comments about the way HC Groep B.V. processes your data, please send them to [privacy@hcgroep.com](mailto:privacy@hcgroep.com).
- iii. HC Groep B.V. wants to be sure that the request has been made by you. That is why we kindly ask that you, along with your request for access, correction or removal, send us a copy of your ID. To protect your privacy, HC Groep B.V. asks you to **black out** your photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), document number and citizen service number/social security number in this copy.
- iv. HC Groep B.V. will respond to your request as soon as possible, but at least within four weeks.

## 9. RIGHT TO COMPLAIN

### A. INTERNAL HANDLING

- i. If you have any complaints about the processing of (personal) data, HC Groep B.V. would like to clear the air with you in mutual consultation. Please send your complaint to [privacy@hcgroep.com](mailto:privacy@hcgroep.com).

## **B. DATA PROTECTION AUTHORITY**

- i. Based on the General Data Protection Regulation, you have the right to submit a complaint to your own Data Protection Authority about our processing of your personal data. You can contact the lead supervisory authority of HC Groep B.V., which is the Dutch DPA (Autoriteit Persoonsgegevens). For more information on your right to complain, please visit the Dutch DPA's website: <https://autoriteitpersoonsgegevens.nl/en>.

## **10. QUESTIONS**

### **A. CONTACTPERSON**

- i. HC Groep B.V. has appointed de IT-afdeling as the person responsible in the area of GDPR. When you have remarks regarding this privacy statement or you have general questions regarding the GDPR, you can contact us via [privacy@hcgroep.com](mailto:privacy@hcgroep.com)