

## Privacy and Cookie Statement Nastrax

Personal data is processed in the context of the products offered and services provided by Nastrax B.V. ("**Nastrax**"). The concept of 'personal data' includes all information about an identified or identifiable natural person. With regard to such processing of your personal data as set out in this Privacy and Cookie Statement, Nastrax qualifies as the data controller in the meaning of the [General Data Protection Regulation \(EU\) 2016/679](#) ("GDPR"). You will find our contact details below:

Nastrax B.V.  
Chromiumweg 163  
3812 NM Amersfoort  
+ 31 (0) 85 303 7898  
The Netherlands  
[info@nastrax.com](mailto:info@nastrax.com)

Nastrax respects your privacy and wishes to inform you via this Privacy and Cookie Statement about our use of your personal data. Please feel free to contact us at any time should you have any questions.

### Which personal data does Nastrax process?

#### ***Clients***

Nastrax may process the following (categories of) personal data of **clients** and their contact persons:

- Name and address details (name, first names, initials, titles, gender, address, postal code, residence) as provided by the client;
- If the client uses the web portal: username and password, ID keys, SIM card data and location data (incl. time). If the client chooses to link the name of the employee to the ID key, the name will also be processed;
- Other contact details (telephone number, e-mail address and similar data required for communication) as provided by the client;
- Data obtained from a public source (such as the Commercial Register, the Chamber of Commerce and the Land Register);
- Data for the purpose of calculating and recording fees and expenses, making payments and recovering claims, including the bank account number provided by the client;
- Other data of clients of which the processing is required by or necessary to comply with applicable laws or regulations, such as under certain circumstances, the processing of data relating to an identity document.

#### ***Suppliers***

Nastrax may process the following (categories of) personal data of persons from whom Nastrax purchases products or services or who work for these **suppliers**:

- Name and address details (name, first names, initials, titles, gender, address, postal code, residence) as provided by the supplier;

- Other contact details (company name, job title, telephone number, e-mail address and similar data required for communication) as provided by the supplier;
- Data for the purpose of placing orders or purchasing services; calculating and recording fees and expenses and making payments and collecting receivables, including the bank account number as provided by the supplier;
- Other data of suppliers of which the processing is required by or necessary to comply with applicable laws or regulations.

## ***Job applicants***

Nastrax may process the following categories of personal data from **job applicants**:

- Name and address details (name, given names, initials, titles, gender, address, postal code, place of residence) as provided by the job applicant;
- Other contact details (telephone number, e-mail address and similar details necessary for communication) as provided by the job applicant;
- Nationality and date of birth as provided by the job applicant;
- Availability, CV and employment history, education history (copy of diplomas, certificates, letters of reference), motivation letter as provided by the job applicant and and where relevant to the vacant position: the results of a competency test taken;
- References as provided by the job applicant or referent, data regarding the position applied for, notes of interviews and written communication with the job applicant.

## ***Third parties***

Nastrax may process the following (categories of) personal data of third parties (such as our website visitors):

- Name and address details (name, given names, initials, titles, gender, address, postal code, place of residence) insofar as provided to Nastrax, e.g. via the web form;
- Other contact details (company name, job title, telephone number, e-mail address and similar details necessary for communication) insofar as provided to Nastrax, e.g. via the web form;
- Data related to visiting our website [www.nastrax.com](http://www.nastrax.com), including your IP address, as set out in more detail below under “**Cookies**”;
- Data relating to electronic messages originating from or intended for third parties and data required to maintain contact with these third parties;
- Other data acquired from public sources or provided to Nastrax by clients or third parties regarding the handling of a matter or the settlement of a dispute.

## **On the basis of which legal processing grounds and for which purposes does Nastrax process your personal data?**

Nastrax processes your personal data on the basis of one or more of the following legal processing grounds:



- a) If this is necessary for the performance of an agreement to which you are a party or to perform precontractual acts at your request;
- b) If this is necessary to comply with statutory obligations;
- c) If this is necessary to justify our legitimate interests or the interests of a third party;
- d) Your consent.

If Nastrax processes your personal data on the basis of your consent, Nastrax will ask you for it separately. You may withdraw your consent at any time. Nastrax draws your attention to the fact that the withdrawal of your consent does not affect the lawfulness of the processing of your personal data prior to the withdrawal of your consent.

Nastrax uses the above personal data for the purposes stated below, in respect of which we have indicated for each purpose on the basis of which of the abovementioned legal processing grounds (a through d) Nastrax does so. If the processing is based on the principle of 'legitimate interest', we briefly explain this interest. If you have any specific questions in this respect, please do not hesitate to contact us.

*Purposes with corresponding processing grounds:*

- to provide our products and services (*a, b and c: being able to offer and improve our services*);
- for the administration of Nastrax, including the calculation or recording of fees or benefits, income and expenses, the payment and collection of claims (including the use of collection agencies or bailiffs) (*a, b and c: the importance of keeping proper records*);
- to be able to deal with any complaints and disputes about our products and/or services (*a, b and c: to defend our rights, to maintain and improve existing relationships by means of proper handling of complaints and to improve the quality of our products and services*);
- to generate statistics regarding the use of our website (*a, b and c: our interest to provide you with an optimized website*);
- to maintain contact and communicate with you (*a, b, c: the interest in bringing our products and services to the attention of existing clients*);
- to handle your job application (*a, b, c: our legitimate interest in assessing whether you are suitable for the job opening and d: consent if you wish to remain in our portfolio, see the header: "How long does Nastrax retain your personal data?"*);
- for placing orders or purchasing services (*a, b and c: our interest in being able to keep proper records*);
- for conducting audits and other internal controls (*a, b and c: our interest in being able to keep proper records*);
- to comply with our legal and statutory obligations (*b, c: the interest of being able to meet these obligations*).

**To whom does Nastrax provide your personal data?**

Nastrax does not provide your personal data to third parties ('recipients' within the meaning of the applicable privacy legislation), unless this is necessary for the proper



performance of the purposes set out in this Privacy and Cookie Statement, if the law requires us to do so or if you have provided your consent to this end. The third parties to whom the personal data are made available are obliged to handle your personal data confidentially. If these parties qualify as a 'data processor' within the meaning of the applicable privacy legislation, Nastrax will ensure that a data processing agreement is concluded with these parties, which complies with the requirements included in the GDPR. Third parties which offer services to Nastrax as independent data controllers, such as accountants, lawyers and civil law notaries, are themselves responsible for the (further) processing of your personal data in accordance with the applicable privacy legislation.

Nastrax can share personal data of **clients, suppliers, job applicants and third parties** with:

- Suppliers (for example software suppliers, bailiffs, courier services, accountants, etc);
- With counterparties, other lawyers or advisors in the event of a dispute;
- Courts and government institutions;
- With our legal successors if Nastrax is acquired by or merged with another company, for example through bankruptcy and also with third parties involved in such proposed or actual business transaction;
- Other parties, such as regulators and other authorities where required by law or with your consent.

In order to provide our services, Nastrax might need to transfer your personal data to a recipient in a country outside the European Union with a lower degree of protection of personal data than the European law offers. In that case, Nastrax will ensure that such a transfer of personal data is in accordance with the applicable laws and regulations, for example by concluding a model contract prepared and approved for that purpose by the European Commission and will assess whether any additional measures are necessary to guarantee an appropriate level of protection of your personal data. Please do not hesitate to reach out to us if you wish to receive more information about the appropriate or suitable safeguards in place for data transfers outside of the European Union or if you would like to obtain a copy of them.

## **Cookies**

Our website [www.nastrax.com](http://www.nastrax.com) uses cookies – small text files – and similar techniques (hereinafter jointly referred to as “cookies”). Cookies are placed on your computer, tablet, mobile phone (hereinafter jointly referred to as “device”) and are read out when you use our website. Please find below an explanation of the various types of cookies our website uses.

### ***Functional cookies***

Our website cannot function properly without certain cookies. We use the following functional cookies, also known as necessary cookies:

Name	Purpose	Duration
wp-wpml_current_language	This cookie indicates the country code calculated from the website visitor's IP address and is used to determine in which language the website should be displayed.	Sessie

## ***Analytical cookies***

We use analytical cookies to properly adjust our website to the preferences and interests of our website visitors and to offer you a desirable website experience.

These cookies channel back information to our data analytics tool, Google Analytics from Google LLC ('**Google**'). Through Google Analytics, we are provided insight into the way in which our website is used. This regards user statistics, such as the number of individual visitors, the frequently used pages and the average duration of a visit. To this end, personal data such as your IP address, information about the device you used (device identifiers), cookie identifiers and client identifiers are processed.

We have followed the [Manual for Privacy Friendly Google Analytics Settings of the Dutch Data Protection Authority](#) for the use of Google Analytics. This means, among other things, that we have instructed Google to delete the last three digits of your IP address (making it difficult to trace the IP address to a specific visitor) and that we have disabled the default settings for sharing data with Google.

In addition, Nastrax has entered into a data processing agreement with Google. We do not use any other Google services in combination with the Google Analytics cookies. The limited information that is shared with Google through the use of Google Analytics can be transferred to and stored by Google on servers in the United States.

We use the following analytical cookies:

Name	Purpose	Duration
_ga	This cookie is placed in order to collect statistics about the website to enhance user experience.	2 years
_gid	This cookie is used in order to distinguish different visitors to our websites.	1 day
_gat	This cookie is used for throttling requests to Google Analytics to increase the efficiency of network calls.	1 day

## *Deletion of cookies*

You can delete cookies and/or refuse to place new cookies through your browser settings. The steps to take in order to do this differ per browser. See the cookie settings available in your web browser(s) for more information. Please find below the instructions for different frequently-used browsers:

[Google Chrome](#)

[Firefox](#)

[Internet Explorer](#)

[Edge](#)

[Safari](#) and more specific information for Apple devices can be found [here](#).

[Opera](#)

If you do not want Google compiling and using Google Analytics data, you can also download and install the browser plug-in available under:

<https://tools.google.com/dlpage/gaoptout>.

More information on cookies and deleting cookies can be found at the [Dutch Consumer's Association](#), through [Consuwijzer](#) and through <http://www.youronlinechoices.eu>.

## **How long does Nastrax retain your personal data?**

Nastrax does not retain your personal data in an identifiable form for longer than is necessary to achieve the purposes included in this Privacy and Cookie Statement. More specifically, Nastrax applies the following retention periods:

- The personal data you provide to Nastrax for your application will be retained for up to four weeks after the end of the application procedure. With your consent, we will retain your personal data in our portfolio up to one year after termination of the application process. This will give us the possibility to contact you for possible future job openings at Nastrax. Personal data that you have provided in the context of your application will become part of your personnel file when you start working for Nastrax.
- Personal data processed for or via the web portal shall be deleted upon expiry of the agreement entered into with the customer or earlier if the customer removes (certain) personal data from the web portal himself;
- Personal data that must be kept on the basis of Article 52 of [the Dutch State Taxes Act](#) will be kept for 7 years (from the end of the year in which the data in question have lost their current value for the (tax-) related business operations) in connection with the tax retention obligation incumbent on Nastrax pursuant to Article 52(4) of the Dutch State Taxes Act.

The abovementioned specific retention periods can be extended if statutory retention obligations apply or will become applicable. Nastrax may also retain the personal data for a longer period of time if this is necessary in light of our legitimate interests, e.g. for the

handling of incidents and/or legal disputes. For more information regarding the retention periods related to the use of cookies, we kindly refer you to the "Cookies" section in this Privacy and Cookie Statement.

## **Security**

Nastrax has taken appropriate technical and organisational measures to secure your personal data against unauthorised or unlawful processing and against loss, destruction, damage, modification or publication. If you have any questions about the security of your personal data, or if you suspect or see signs of misuse, please contact us via [info@nastrax.com](mailto:info@nastrax.com).

## **Your privacy rights**

You have the following rights in respect of the processing of your personal data by Nastrax:

- the right to request whether Nastrax processes your personal data and if so, the right to access your personal data and to receive information about the processing of your personal data;
- the right to rectification of your personal data if these are incorrect or incomplete;
- the right to have your personal data deleted ('right to be forgotten');
- the right to object to the processing of your personal data or to limit the processing of your personal data;
- the right to withdraw your consent for the processing of your personal data, if the processing is based on your consent;
- the right to receive or surrender your personal data to a third party appointed by you in a structured, customary and machine-readable form ('right to data portability').

Nastrax does not use automated decision-making within the meaning of Article 22 GDPR.

To exercise your rights, you can contact us via [info@nastrax.com](mailto:info@nastrax.com) or by regular mail via the contact details as stated at the beginning of this Privacy and Cookie Statement.

In order to prevent that Nastrax discloses information to the wrong person, Nastrax can ask you for additional information to verify your identity. In principle, Nastrax will inform you of whether Nastrax can comply with your request, within one month after receipt. In specific cases, for example when it concerns a complex request, this term may be extended by two months. Nastrax will inform you of such an extension within one month after receiving your request. On the basis of the applicable privacy legislation, Nastrax can refuse your request under certain circumstances. If this is the case, Nastrax will explain to you why. You can find more information about your privacy rights on the website of the [Dutch Data Protection Authority](#).

## **Complaints**

If you have a complaint about the processing of your personal data by Nastrax, we will be happy to work together to find a solution. If this does not lead to the desired result, you will have the right to file a complaint with the competent supervisory authority. In the Netherlands, this is the [Dutch Data Protection Authority](#). If you live or work in another



country of the European Union, you can file a complaint with the supervisory authority of that country.

### **Amendments**

Nastrax reserves the right to amend this Privacy and Cookie Statement. The most recent version of this Privacy and Cookie Statement will always be posted on our website. If substantial amendments are made that could have a significant impact on one or more of the data subjects involved, Nastrax will endeavour to inform those data subjects directly.