

# Privacy policy Retroactive

<https://www.retroactive.nl>

## About our privacy policy

Retroactive cares greatly about your privacy. We exclusively process data that we need for (improving) our services, and carefully handle all information gathered about you and your usage of our services. Your data is not shared with third parties for commercial goals. This privacy policy applies to the use of the website and the services provided by Retroactive. The starting date for the validity of these terms and conditions is 27/06/2022, with the publication of a new version the validity of all previous versions is canceled. This privacy policy describes what information about you is collected by us, what this data is used for and with whom and under what conditions this data could be shared with third parties. We also explain to you how we store your data, how we protect your data against misuse and what rights you have regarding the personal data you provide us.

If you have any questions about our privacy policy, please contact our privacy contact person, you will find the contact details at the end of our privacy policy.

## About our dataprocessing

Below you can read how we process your data, where we save it, what security techniques we use and to whom the data is visible.

### Webshopsoftware

#### MijnWebwinkel

Our webshop has been developed using MijnWebwinkel a.k.a. MyOnlineStore software. Personal data gathered with the use of our website and services is shared with MyOnlineStore. MyOnlineStore requires access to these details to offer (technical) support. They will not use this data for any other purposes. MyOnlineStore has an obligation, based on the agreement we have with them, to take necessary precautions and security measures when it comes to your personal data. MyOnlineStore uses cookies to gather technical information about the use of the software. No personal data is gathered and/or stored. MyOnlineStore maintains the right to internally share the gathered data to improve its own services.

### Webhosting

#### MijnDomein

We use the webhosting- and email services of MijnDomein. MijnDomein processes personal data on behalf of us and will not use this data for their own purposes. This party can however collect meta-data about the use of their services. This is not personal data however. MijnDomein has taken necessary precautions and security measures, both technical and organisational, to prevent loss, abuse and misuse of your personal data. MijnDomein is obligated to a duty of confidentiality based on the agreement we have with them.

### E-mail and mailinglists

#### My webhost

For our regular business email, we use the email services of My webhost. This party has implemented fitting technical and organisational measures to prevent misuse, loss or corruption of your data. My webhost does not

have access to our mailbox and we treat our email-traffic confidentially.

## **Payment processors**

## **Reviews**

## **Transport and logistics**

## **PostNL**

If you place an order with us it is our responsibility to have your order successfully delivered to you. For the delivery we use the services of PostNL. For a successful delivery it is important that we share your name, address and residential details with PostNL. PostNL uses this information with the sole purpose to carry out the agreement of delivery. In case of PostNL hiring subcontractors, they will share said information with these parties.

## **Accounting and Bookkeeping**

## **External sales channels**

## **Purpose of data processing**

### **General purpose of data processing**

We use your data with the sole purpose of providing you with our services. This means that the goal of processing this data stands in direct relation to the assignment or task that you offer us. We do not use this data for (addressed) marketing purposes. If you share information with us and we use this information to - not based on a request - contact you at a later time, we will first ask for explicit consent. Your data is not shared with third parties, with any other purpose than to fulfil accountancy and administrative obligations. These third parties are all obligated to a duty of confidentiality based on the agreement we have with them, an oath or legal obligation.

### **Automatically collected data**

Information automatically gathered by our website is processed with the sole purpose of providing you with and/or to further improve our services. This information (for instance your IP address (anonymised), web browser and operating system) is not personal information.

### **Cooperation in tax and criminal investigation**

In some cases, we may be obligated by government to a lawful duty of sharing your information with the purpose of assisting in a fiscal or criminal investigation. In such cases we are forced to comply and assist, but will, based on lawful possibilities, offer objection.

### **Retention periods**

We store your data for as long as you are a client with us. This means that we maintain and keep your client profile until you make it known to us that you no longer desire to use our services. Such a message also functions as a request to be forgotten. We are required to keep invoices with your (personal) information due to relevant administrative obligations, this information is safely stored for as long as the relevant term for these obligations has not yet passed. Personnel no longer has access to your client profile and any documents made because of your assignment or task.

## **Your rights**

Based on valid Dutch and European law you, as a concerning party, have certain rights when it comes to personal data that is processed by or on behalf of us. Below you may find an explanation of these rights and how you, as a concerning party, can invoke these rights. In principle to prevent abuse we only send invoices and copies of your data to e-mail addresses that you have made known to us. Should you wish to receive this data on another e-mail

address or for instance per mail we will ask you to identify yourself accordingly. We maintain an administration of concluded requests, in case of a request to be forgotten we will maintain an administration of anonymised data. You receive all invoices and copies of data in files that are structured in a machine-readable format Based on data classifications that we use within our system. At all times you maintain the right to lodge a complaint with Autoriteit Persoonsgegevens if you suspect that we mistreat or misuse your personal data.

### **Right of inspection**

At all times you maintain the right to view the data we process that has a relation or may be reducible to your person. You may request such a viewing to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, a copy of all data with an added overview of processors managing this data while also mentioning the categories under which we store this data.

### **Right to rectification**

At all times you maintain the right to have the data we process that has a relation or may be reducible to your person be adjusted. You may request such an adjustment to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, a confirmation that the data has been adjusted.

### **Right to restriction of processing**

At all times you maintain the right to limit the data we process that has a relation or may be reducible to your person. You may request such limiting to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, a confirmation that the processing of your data is limited until you chose to cancel said limitation.

### **Right of transferability**

At all times you maintain the right to request for the data we process that has a relation or may be reducible to your person be processed by a third party of choice. You may send in such a request to our contact in charge of privacy matters. You will receive a response to your request within 30 days. If your request is approved we will send you, via the e-mail address known to us, your (personal) invoices or copies of data that we, or third parties on behalf of us, have processed. It is highly likely that in such a case we can no longer offer our services to you for we can no longer guarantee the previous data safety.

### **Right of objection and other rights**

At all times you maintain the right to object to the processing done by us, or on behalf of us by third parties, of your personal data. In case of such an objection we will immediately cease all processing of your data while your objection is being investigated and handled. In case of a justified objection we will return all invoices and/or copies of personal data that we, or third parties on behalf of us, have processed up until that point and cease processing thereafter. You also maintain the right to not be subject of automated decision-making processes or profiling. We process your data in such a way that this right does not apply. Should you believe that this right does apply then we ask you to reach out to our contact in charge of privacy matters.

## **Privacy policy changes**

At all times we maintain the right to alter our privacy policy. This page however always displays the most recent version of our privacy policy. Should a new privacy policy have consequences for the ways in which we process recently gathered data in regard to your person, then we will notify you of this via e-mail.

## **Company details**

### **Retroactive**

Heuvelstraat 62 5502 AE Veldhoven Nederland **T** (068) 521-8051 **E** info@retroactive.nl

### **Contactpersoon voor privacyzaken**

Koen Tuithof