

PRIVACY STATEMENT

Zielewind, located at Valge 45, 9965 PD Leens, the Netherlands, is responsible for the processing of personal data as described in this privacy statement.

ARTICLE 1 – GENERAL DATA PROTECTION REGULATION

Under the General Data Protection Regulation (GDPR), new rights apply to the data subject and further-reaching obligations apply to the processor, controller, administrator and any sub-processors of personal data.

This document contains our statement regarding the processing and protection of (personal) data, as well as our disclaimer. This statement is binding and publicly available.

ARTICLE 2 – DEFINITIONS

Data subject:

The visitor to our website, user of our programmes, user of our platforms, applicant for our service(s), and/or recipient of our documents in any form whatsoever.

Processor / Controller / Administrator:

Zielewind, hereinafter referred to as ZW.

Processing:

Processing includes, among other things, the collection, recording, organisation, structuring, storage, updating or modification, retrieval, consultation, use, transmission, distribution or otherwise making available, combining, restricting, deleting or destroying of data.

Personal data / Data:

Personal data means information relating to an identified or identifiable natural person (the data subject), such as names, addresses and telephone numbers (including business email addresses or telephone numbers relating to a specific individual), identification numbers such as employee numbers and customer numbers, photographs, age, date of birth and other relevant information.

ARTICLE 3 – ACTIVELY PROVIDED DATA

1. The data subject may only voluntarily provide their personal data via the website, webshop and/or social media channels of ZW. The data

provided by the data subject during this process will only be used for the purpose for which it was provided.

2. For completeness, the data referred to in paragraph 1 that ZW stores in relation to an application and any subsequent services provided includes:
 - a. Name and email address from the contact form, to enable communication with the relevant person;
 - b. Name, email address and IP address from the opt-in form, to build a relationship with potential clients;
 - c. Company name, name, date of birth, address details, bank account number, VAT number, Chamber of Commerce registration number, email address and (optional) telephone number from the payment form, in order to issue invoices and for further administrative purposes;
 - d. Name, email address and IP address from the chat form, to enable communication with the person who submitted a chat message;
 - e. Name, email address and IP address from the support form, to provide customer service and answer support requests;
 - f. Data relating to the activities of the data subject on ZW website(s);
 - g. Data relating to the browsing behaviour of the data subject on ZW website(s);
 - h. Internet browser and device type.
3. The data referred to in paragraph 2 of this article will only be processed if it has been actively provided by the data subject.
4. It is possible that data may be included in the ZW database which has been obtained through channels other than the ZW website. This may include contact by telephone, WhatsApp, email, social media or through a third party. In all of these cases, the data actively provided by the data subject will only be used for the purpose for which it was provided.
5. ZW does not intend to collect data from website visitors under the age of 16 unless they have permission from a parent or legal guardian. However, ZW cannot verify whether a visitor is over the age of 16. ZW therefore advises parents to be involved in their children's online activities in order to prevent personal data being collected without parental consent.

If the data subject believes that ZW has collected personal data of a minor without consent, please contact ZW will then remove this information.

ARTICLE 4 – PRELIMINARY VERIFICATION OF DATA

ZW may verify data provided by the data subject in the registers of the Chamber of Commerce, solely to confirm the accuracy of the information.

ARTICLE 5 – PURPOSE OF PROCESSING

The data referred to in Article 3 paragraph 2 of this statement is required for processing requests submitted by the data subject, fulfilling agreements, complying with legal obligations, maintaining communication with the data subject, tailoring products and services to the needs of the data subject, and carrying out any verification checks as described in Article 4.

Failure by the data subject to provide the required information necessary for fulfilling an agreement does not release the data subject from any obligations entered into with ZW.

ARTICLE 6 – AUTOMATED DECISION-MAKING

ZW does not make decisions based on automated processing that may have adverse consequences for the data subject.

ARTICLE 7 – PROCESSING OF DATA

1. All (personal) data obtained by ZW from the data subject, regardless of the channel through which it was or is obtained, will not be retained longer than strictly necessary for the purpose for which it was actively provided.

Furthermore, only data actively provided by the data subject will be used for processing personal data.

2. Exceptions as referred to in Article 43 of the Dutch Personal Data Protection Act (former legislation) remain applicable, unless the scope, purpose or nature of such exceptions differs under the GDPR.

ARTICLE 8 – SHARING PERSONAL DATA WITH THIRD PARTIES

ZW only shares personal data of the data subject with third parties where this is necessary for the performance of an agreement or to comply with a legal obligation.

With companies processing data on behalf of ZW, a processing agreement is concluded to ensure the same level of security and confidentiality of personal data as required by law. ZW remains responsible for these processing activities.

ZW does not provide personal data to other third parties unless the data subject has explicitly given permission.

ZW uses, among others but not limited to, the following suppliers that process or store personal data on behalf of ZW:

RoundCube, Google Analytics, Google Drive, Spotify, Instagram, LinkedIn, WordPress, Carré Communicatie and Chipleader Marketing.

ARTICLE 9 – SECURITY AND PROTECTION OF YOUR DATA

1. Data provided via the ZW website is transferred exclusively through an encrypted (secure) SSL connection, ensuring that third parties cannot intercept the data being sent or received. The active secure connection can be recognised by the padlock symbol displayed in the browser address bar.
2. Data received is transferred to an SSL-secured server. These environments may be shared with online-accessible systems.
3. ZW takes the protection of the data subject's information seriously and implements appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unlawful modification.

If the data subject believes that their data is not properly secured or suspects misuse, they can contact info@zielewsind.com

ARTICLE 10 – RIGHT OF ACCESS TO YOUR DATA

1. Once the data subject has been included in a ZW database, ZW will retain the data of the data subject.
2. The data subject may submit a request for access to their data at any time. ZW will comply by providing an overview of the data registered by ZW.
3. It is the responsibility of the data subject to keep their information up to date by providing timely changes to ZW.

ARTICLE 11 – RIGHT TO ERASURE

1. Once the agreement between ZW and the data subject has ended, or when data is no longer required, the data subject may submit a written request for their data to be removed from the ZW records.
2. A request as described in Article 11 paragraph 1 will always be carried out unless an exception applies as described in Article 11 paragraph 3.
3. A request for deletion will not be carried out if:

- a. The agreement between the data subject and ZW can no longer be properly fulfilled as a result;
- b. The request does not need to be fulfilled due to an exception, including but not limited to Article 17 paragraph 3(e) of the GDPR.

ARTICLE 12 – USE OF THE WEBSITE

1. ZW uses active hosting services for its website with the aim of providing a secure environment for every visitor. ZW strives to maintain a secure environment and will outsource payment-related processes to specialised third parties that protect payment processes using SSL/TLS-secured connections and have expertise in this field.
2. The visitor indemnifies the administrator and ZW against any damage arising from an insecure connection on the visitor's own side. Examples include, but are not limited to, the use of unsecured WiFi networks, outdated antivirus software or operating systems, effects of hacking, etc.
3. The websites of ZW are always available through a secure SSL/TLS connection. Visitors can recognise this connection by the padlock symbol in the browser address bar. If this padlock is not visible, ZW requests that the visitor informs ZW immediately.