



THE CLEVER CONNECTION

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Privacy Statement

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IBAN: NL97RAB00379993481

THIS POLICY CONTAINS INFORMATION REGARDING OUR USE OF COOKIES, THE PROCESSING OF YOUR PERSONAL DATA AND YOUR PRIVACY RIGHTS.

Please note that this Privacy Policy applies to personal (identifiable) data that is collected and processed by our company.

We understand the importance of protecting your information. We recognize that when you choose to provide us with information about yourself, you trust us to use it in a responsible manner. This Privacy Policy applies to any information provided or collected through our website and services where we as a data controller collect, process, use, and/or disclose information you provide by using the website and/or services.

You can contact us by sending an email to the email address listed on the last (about us) page of this policy document.

We will use your personal data only for the purposes and in the manner set forth below, which describes the steps we take to ensure our processing of your personal data follows the General Data Protection Regulation ((EU) 2016/679) (**GDPR**) and any implementing legislation (**Data Protection Legislation**).

YOUR RIGHT TO OBJECT – PLEASE NOTE THAT YOU HAVE A RIGHT TO OBJECT TO PROCESSING OF YOUR PERSONAL DATA WHERE THAT PROCESSING IS CARRIED OUT FOR OUR LEGITIMATE INTEREST.

Please read the following carefully to understand our use of your personal data.

1. What Type of Personal Data Do We Collect about You?

“Personal data” means any information about an identifiable individual. We only collect personal data about you on our website and services which you volunteer by emailing us, by using our online forms, to deliver a service or product to you, or to send you newsletters or other information.

In addition to the information, you provide to us, we collect certain information when you visit our website and use our services, as explained in the ‘How Do We Use Cookies’ section below.

When you visit or use our website and services in any way, we collect and process several types of information about you:

- **Identity Data** includes first name, last name, username, or similar identifier.
- **Contact Data** includes email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and services.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communication Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Unless you contract our products or services, the provision of your personal data is not a statutory or contractual requirement, and you may refuse to disclose the same. You can choose not to provide this information; however, you might not be able to gain access to our information, services, or products.

2. Links to Other websites

Our website may, from time to time, contain links to third parties' websites. If you follow a link to any of those third-party websites, please note that those websites have their own privacy policies and we do not accept any responsibility or liability for those practices. Please check those policies before you submit any personal data to those websites.

3. No Information from Children Under Age 16

Our website is not intended for children, and we do not knowingly collect data relating to children. If you are under the age of 16, please do not attempt to register with us at this website or provide any personal information about yourself to us. If we learn that we have collected personal information from a child under the age of 16, we will promptly delete that information. If you believe we have collected personal information from a child under the age of 16, please send it to the email address listed on the last (about us) page of this policy document.

4. How Do We Use the Information We Gather?

We will only use your personal data for the purposes and legal bases set out in the table below:

Purpose(s) for Processing	Legal Basis for Processing
<ul style="list-style-type: none"> • To register a new customer, create and maintain your customer account and provision of services to you. • To provide platform or software as a service. • To provide technical support. • To manage our relationship with you, including processing your inquiry and delivering our products and services to you. 	<p>Processing is necessary for the performance of a contract or to enter into such a contract with you.</p>
<ul style="list-style-type: none"> • To provide you with information about our company and its products and services and provide newsletters or email updates to you. • • To notify you about products or services that may be of interest to you. • • To understand the flow of traffic on our website and to provide a better website experience and to understand the needs of our customers. 	<ul style="list-style-type: none"> • Your consent – which you can withdraw at any time.

- To manage and operate our website – to keep our website updated and relevant, to develop our business and to inform our marketing strategy and monitoring how you use our website and services.
- To provide you with general information on the website and services and to provide you with our products and services.
- To measure your interest in and improve our products, services, and website.
- To provide you with information, products, or services that you request from us.
- To ensure that content on the website and services is presented in the most effective manner for you and for your computer or mobile device.
- To carry out our obligations arising from any contracts entered between you and us.
- To allow you to participate in interactive features of the website when you choose to do so.

The processing is necessary to support our **legitimate business interests** in managing our business provided such interests are not overridden by your interests and rights. We have carried out a balancing test to ensure that your interests do not override this legitimate business interest of ours. **Please note that you have a right to object to processing of your personal data where that processing is carried out for our legitimate interest. You have the right to object at any time.**

<ul style="list-style-type: none">• To record and support your participation in the activities you select.• To notify you about any changes to the website, policies, products, and services.• To assist in providing customer support.	
<ul style="list-style-type: none">• For the prevention and detection of fraud or other crimes or for the purpose of responding to a binding request from a public authority or court.	<p>The processing is necessary to comply with legal and regulatory obligations.</p>

In addition to the purpose for which you submitted your personal data, you may also be given the option (through a check box or otherwise) to have your personal data used for an activity or service different from the primary activity or service that you are requesting.

5. Do We Share Your Personal Information with Third Parties, such as Affiliates, Service Providers or Consultants?

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) as far as reasonably necessary for the purposes to provide you with our products and services, and on the legal bases, set out in this policy.

We may disclose your personal data to third parties who provide a service to us, including:

1. Providers of cloud-based CRM software in relation to customer account maintenance and billing.
2. Providers who collect information on our behalf, including as necessary to operate features of the website and services, such as customer satisfaction surveys.
3. Providers of cloud-based accounting software in relation to management of accounting.
4. Third party service providers that help us develop, operate and manage our website and services to deliver products and services that you contracted from us.
5. We may also disclose your personal data to the following recipients:
 - a. If our company or all its assets are acquired by a third party, in which case your personal data held by us may be included in the transferred assets (for example, in the form of a database of users of the website and services). Similarly, personal data may be transferred as part of a corporate reorganization, insolvency proceeding, or other similar event, if permitted by and done in accordance with applicable law.
 - b. If we are under a duty to disclose or share your personal data to comply with any legal obligation or court order, or to enforce, establish, exercise, or defend legal rights, the rights, property, or safety of you, us, our group, or employees.
 - c. To enforce applicable terms of use, including investigation of potential violations as permitted by law.
 - d. To detect, prevent, or otherwise address fraud, security, or technical issues; and to protect against harm to the rights, property, or safety of Onetrail, our employees, our users, customers, or the public as required or permitted by law.

We may also provide non-personal data to third parties, where such information is combined with similar information of other users of the website and services. The aggregate information that we share may include anonymous information that is captured using cookies and other similar tracking technology. The third parties to whom we may provide this information may include our website design, data analysts, development, and hosting contractors.

6. Is Your User Data Secure?

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access and use.

As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet.

We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organization. We will continue to revise policies and implement additional security features such as modern technologies becoming available. Where we have given you a password which enables you to access certain parts of our website and services, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our website. Any transmission of personal data is at your own risk. Once we receive your personal data, we use appropriate security measures to prevent unauthorized access or disclosure.

7. How Long Do We Store Your Data?

We store your personal data during the time that you are a customer or end user for the purposes of providing you the services, and for up to seven years after you cease to be a customer or end-user. If you have never been a customer or registered end-user of but have consented to receive marketing inquiries or other information from us, we may store your data for up to two years.

We reserve the right to store or delete your personal data earlier or later than set forth herein if required to do so by an applicable law or regulation, including the GDPR and for the exercise of defense of legal claims.

8. Where We Store Your Personal Data

The personal data that we collect from you WILL NOT be transferred to, and stored at, a destination outside the European Economic Area (EEA). We will take all steps necessary to ensure that your personal data is treated securely and in accordance with this Privacy and Cookies Policy and the Data Protection Legislation.

9. Your Rights

We are committed to ensuring that you have control and visibility of your personal data. Below is a summary of your rights and additional commitments from us. You may exercise your rights by sending an email to the email address listed on the last (about us) page of this policy document.

Right of Access

You can request a copy of the personal data we hold about you.

Right to Rectification

You have the right to request that we correct any inaccuracies in the personal data we hold about you and complete any personal data where this is incomplete.

It is your responsibility to ensure that any information you have provided to us is accurate and up to date.

Right to Erasure ('Right to be Forgotten')

You have the right to request that your personal data be deleted in certain circumstances including:

1. The personal data are no longer needed for the purpose for which they were collected.
2. You withdraw your consent (where the processing was based on consent).
3. You object to processing and there are no overriding legitimate grounds justifying us processing the personal data (see Right to Object below).
4. The personal data has been unlawfully processed.
5. To comply with a legal obligation.

However, this right does not apply where, for example, the processing is necessary:

1. To comply with a legal obligation.
2. For the establishment, exercise, or defense of legal claims.

Right to Restriction of Processing

You can ask that we restrict your personal data (i.e., keep but not use) where:

1. The accuracy of the personal data is contested.
2. The processing is unlawful, but you do not want it erased.
3. We no longer need the personal data but you require it for the establishment, exercise, or defense of legal claims.
4. You have objected to the processing and verification of our overriding legitimate grounds are pending.
5. We can continue to use your personal data:
 - a. Where we have your consent to do so.
 - b. For the establishment, exercise, or defense of legal claims.
 - c. To protect the rights of another.
 - d. For reasons of important public interest.

Right to Data Portability

Where you have provided personal data to us, you have a right to receive such personal data back in a structured, commonly used, and machine-readable format, and to have that data transmitted to a third-party data controller without hindrance but in each case only where:

- a. The processing is carried out by automated means.
- b. The processing is based on your consent or on the performance of a contract with you.

Right to Object

You have a right to object to the processing of your personal data in those cases where we are processing your personal data in reliance on our legitimate interests. In such a case we will stop processing your personal data unless we can demonstrate compelling legitimate interests which override your interests, and you have a right to request information on the balancing test we have carried out. You also have the right to object to where we are processing your personal data for direct marketing purposes.

If you do not want to receive newsletters, announcements, or other communications and/or services from the Onetrail, please do not opt-in for those communications or services at the time of registration. If you have opted-in and, later, wish to unsubscribe by sending an opt-out, please send us an email entitled “UNSUBSCRIBE” to the email address listed on the last page of this policy document.

Right to Complain

You have the right to lodge a complaint with the Data Protection Authority, in the Member State of your residence, place of work or place of an alleged infringement, if you are unhappy with how we are processing your personal data.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than one month after receipt of your request. That period may be extended by two further months where necessary, considering the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. All requests should be addressed to the email address provided on the last (about us) page of this policy document.

10. How Do We Use Cookies?

Cookies are small data files that are stored in your web browser on your computer, tablet, or smartphone (each a “Device”) when you visit a website. Cookies serve several purposes like letting you navigate between pages efficiently, remembering your preferences, interests, or log in details, and improving your experience.

Most web browsers automatically accept cookies, but if you do not want to allow cookies or only allow the use of certain types of cookies, please refer to your browser settings which should allow you to accept or deny cookies. You can also use the browser settings to withdraw your consent to the use of cookies at any time or delete cookies that have

already been set on your Device. Keep in mind that by disabling certain categories of cookies, you may be prevented from accessing some features of our websites.

Onetrail uses cookies to gather information on website usage. This information is gathered to improve the content, usability, and functionality of the website and services. This helps us better understand our customers and improve their experience with us. The following table provides additional information about cookies we use on our website and services:

Categories of Use	Description
Preferences, Features, and Services	Cookies can tell us which language you prefer and what your communication preferences are. They can help you fill out forms on Onetrail.com and Onetrail TPN more easily. They also provide you with features, insights, and personalized content based on other content you have engaged with on the website and services.
Performance, Analytics, and Research	Cookies help us learn how well our website and services perform in various locations, on different devices, and at various times of day.

WEBSITE COOKIES

Further Details on our specific use of cookies are contained in the following table:

Type	Purpose	Who Provides the Cookie?	Settings and Opt out
Optional	Social Media	Twitter	https://twitter.com/personalization
Optional	Social Media	LinkedIn	https://www.linkedin.com/psettings/advertising/actions-that-showed-interest
Optional	Social Media	Facebook	https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen
Optional	Social Media	AddThis	http://www.addthis.com/privacy/privacy-policy/
Optional	Social Media	Google+	https://plus.google.com/settings/
Optional	Video	Youtube	https://support.google.com/youtube/answer/157177?co=GENIE.Platform%3DDesktop&hl=en-GB
Optional	CRM	Hubspot	https://legal.hubspot.com/cookie-policy
Required	Analytics	Google Analytics	handleiding_privacyvriendelijk_instellen_google_analytics_april_22.pdf (autoriteitpersoonsgegevens.nl)

11. Do We Use Your Information for Advertising Purposes?

We do NOT place cookies on partner and other websites to advertise our brands and/or services.

12. Changes to Our Privacy and Cookies Policy

We reserve the right to change this Privacy and Cookies Policy from time to time at our sole discretion. If we make any changes, we will post those changes here and update the “Last revised” date at the top of this Privacy and Cookies Policy. Where you have previously consented to our use of your personal data, your continued use of the website after we make changes is deemed to be acceptance of those changes, so please check this Privacy and Cookies Policy periodically for updates. If we consider the changes to be significant, we will provide more prominent notice (including, for certain services, email notification of privacy and cookies policy changes). We will also keep prior versions of this Privacy and Cookies Policy in an archive for your review.

About Us - Onetrail B.V.

If you have any question, comment, request and/or complaints regarding this Privacy Policy and the information we hold, please contact us at privacy@onetrail.com, call us at +31 30 697 32 88.

Our postal mail address is:

Onetrail B.V.

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