



Privacy Notice
Client and Business

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1. Introduction

Definirs B.V. (Definirs) is committed to protect the privacy of and security of their customers, service providers, contractors and other business partners ("data subjects" or "you") personal data in accordance with General Data Protection Regulation ("GDPR") (EU) (2016/679). This privacy notice applies to all personal data we collect or process about you.

"Personal data" has the meaning given to it in Article 4 of the GDPR. This is any information relating to an individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. Accountability

Definirs is a "data controller". This means that Definirs is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

This Privacy Notice applies to Definirs and all its activities.

3. Data Protection Principles

Definirs is committed to processing personal data in accordance with its responsibilities under the GDPR. Under the GDPR, Definirs is the data controller and as such, determines the purpose and the manner in which, any personal data is/or will be processed. Definirs ensures that it will:

All personal data we process will be treated in accordance with the GDPR. This means that the personal information we hold about you must be:

- i. used lawfully, fairly and in a transparent way;
- ii. collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- iii. relevant to the purposes we have told you about and limited only to those purposes;
- iv. accurate and kept up to date;
- v. kept only as long as necessary for the purposes we have told you about; and
- vi. kept securely

4. The personal data that we process about you

Definirs may collect, use, store and transfer different kinds of personal information about you which can be, generally, grouped together as follows:

- Personal details, e.g. name, function, employer/customer
- Contact details, e.g. business phone number, e-mail address, postal address or mobile numbers.
- Profile details, e.g. username and password, your interests, preferences, feedback and survey responses.
- Technical Data including internet protocol (IP) address, your login data, time zone setting and location when you access our website.
- Usage data details, e.g. information about how you use our website, products and services.

- Marketing and communications details, e.g. your preferences in receiving marketing and other information from us and our third parties and your communication preferences.

5. How Do We Collect Your Information

We use different methods to collect information from and about you including through:

- Direct interactions. You may give us your identity and contact details by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
 - apply for a project or service
 - submit a response to an invitation (or equivalent)
 - subscribe to our service or publications or give us some feedback or submit a complaint.
- Information that we learn about you through our relationship with you.
- Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns which may include personal information. We collect this information by using cookies, and other similar technologies. Please see our Cookie Policy for further details.
- Third parties or publicly available sources. We may receive personal information about you from various third parties and public sources including:
 - analytics providers
 - advertising networks or search information providers
 - data brokers or aggregators.
- Know your client ("KYC") and due diligence. We may carry out KYC and other due diligence checks on potential contractors, clients and suppliers.

6. Purposes and Legal Basis for Processing

We process personal data in order to:

- To contract with you;
- For procurement purposes;
- To manage our relationship with you which will include notifying you about changes to our terms and Privacy Notice;
- To administer and protect our business;
- To improve our products, services, website, marketing, customer relationships and experiences;
- To keep you informed about Definirs when you subscribe to our newsletter;
- To process and respond to your enquiry, application or complaint, for example, in respect of a proposal, working with Definirs team or providing products or services to Definirs.
- We may use your information for another reason where we reasonably consider that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We must have a legal basis to process your personal data. In most cases the legal basis will be one of the following:

- Consent: where you have consented to our use of your information for a specific purpose.
- Contract performance: where your information is necessary to enter into or perform our contract with you (or to take steps at your request before entering into such a contract).
- Legal obligation: where we need to use your information to comply with our legal and regulatory obligations.
- Legitimate interests: where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

When we process special categories of personal data, we will do so only after having obtained your explicit consent or are otherwise lawfully permitted to do so. Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

7. Data sharing

We may share your personal information with:

- Service providers and business partners. We may share your personal data with our service providers and business partners that perform business operations for us. For example, we may partner with other companies for administration;
- Third parties providing services to us, such as market analysis and benchmarking, agents and subcontractors acting on our behalf.
- Social media companies (in a secure format) or other third-party advertisers (subject to your consent) so they can display relevant messages to you and others about us and our activities.
- Any law enforcement agency, court, regulator or official registrar (such as the Dutch Financial Markets Authority), government authority or other third party. We may share your personal data with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

8. International data transfers

In some circumstances, we may transfer data outside of the EEA. We will only transfer personal data outside of the EEA when the EU has determined that this third country offers an adequate level of data protection. Where we transfer personal data outside of the EEA, appropriate measures based on contractual requirements will be taken to ensure the continual protection of the data.

9. How We Keep Your Information Secure

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

10. How Long We Keep Your Information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Please contact us if you would like more information about how long we keep your information.

11. Rights Of Data Subject

Under certain circumstances, data subjects have rights under data protection laws in relation their personal data. These include the right to:

- Request access to personal information (commonly known as a “data subject access request”). This enables data subject to receive a copy of the personal information Definirs holds about and to check that Definirs are lawfully processing it.
- Request correction of the personal information that Definirs holds. This enables data subject to have any incomplete or inaccurate information Definirs hold to be corrected, though Definirs may need to verify the accuracy of the new data provide by the data subject.
- Request erasure of personal information. This enables data subject to ask Definirs to delete or remove personal data where there is no good reason for Definirs continuing to process it. Please note, however, that Definirs may not always be able to comply with this request of erasure for specific legal obligations which will be notified, if applicable, at the time of the request.
- Object to processing of data subjects personal information where Definirs is relying on a legitimate interest (or those of a third party) however, based on data subjects particular situation, it is causing you damage or distress or impacts data subjects rights. In some cases, Definirs may demonstrate that Definirs have compelling legitimate grounds to process data subjects information which override data subjects rights and freedoms.
- Request restriction of processing of personal information. This enables data subject to ask Definirs to suspend the processing of data subjects personal information in the following scenarios:
 - a) if you want Definirs to establish the data’s accuracy;
 - b) where Definirs use of the data is unlawful, but data subject does not want Definirs to erase it;
 - c) where data subject needs Definirs to hold the data even if Definirs no longer require it as data subject needs it to establish, exercise or defend legal claims; or
 - d) data subject have objected to Definirs’ use of their data, but Definirs needs to verify whether Definirs have overriding legitimate grounds to use it.
- Request the transfer of personal information to data subject or to a third party, in a structured, commonly used, machine-readable format. This right only applies where Definirs process data subjects personal information by automated means for contractual purposes or with data subjects consent.
- Withdraw consent at any time where Definirs is relying on consent to process data subjects personal information. If data subject withdraws their consent, Definirs may not be able to provide certain products or services to. Definirs will advise data subject if this is the case at the time of withdraw of consent.
- Raise a complaint: If you have a complaint about the processing of your personal data by Definirs, we will do our utmost to resolve it with you. You can raise a complaint about our processing with the data protection authority in your jurisdiction. In the Netherlands, this is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). If you live or work in another country of the European Union, you can file a complaint with the competent supervisory authority in that country.

Please contact us to update or correct your information if it changes or if the personal data we hold about you is inaccurate. We will contact you if we need additional information from you in order to honour your requests.

12. Contact us

Definirs is the controller responsible for the personal data we collect and process. If you have questions or concerns regarding the way in which your personal data has been used, please email your request to info@definirs.com.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Autoriteit Persoonsgegevens.

13. Changes to this Notice

You may download a copy of this privacy notice at www.definirs.com. We reserve the right to edit this privacy notice. If we change this privacy notice, we will notify you of the changes. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).