

ORCHESTRATED DIGITAL MARKETING

# **Privacy Policy**

**Endeavour Group** 

PRIVACY AND COOKIE STATEMENT ENDEAVOUR GROUP

The Endeavour group as referred to in this privacy and cookie statement consists of the following companies:

- the private company with limited liability Endeavour Group B.V. (Ch. of Comm.: 52162710)
- the private company with limited liability HelloDialog B.V. (Ch. of Comm.: 63401274)
- the private company with limited liability PXL. WIDGETS B.V. (Ch. of Comm.: 73015822)
  - o trading under the name Endeavour
- the private company with limited liability Hollandsch Welvaren Communicatie B.V. (Ch. of Comm.: 34212860)

The companies of the Endeavour group all comply with the same high standards in terms of the protection of your privacy. That is why the companies of the Endeavour group have made arrangements to guarantee that your personal data are protected in an appropriate and uniform manner and can be exchanged safely between the companies of the Endeavour group.

Your privacy is of great importance to the Endeavour group (hereinafter referred to as: we, us). Therefore, we comply with the applicable privacy laws and regulations, including the General Data Protection Regulation (hereinafter referred to as: GDPR) and the GDPR (Implementation) Act.

In this privacy statement, we explain which personal data we process and for what purpose. Please contact us if you have questions or if you want to know exactly what we keep track of. Our contact details are listed at the bottom of this statement.

#### Which terms are used in this privacy statement?

The following definitions apply in this privacy statement:

#### You/your

the person whose personal data we process;

#### Personal data

any data that relate to you and/or can be traced back to you, such as identification details, financial data and data about your devices and online behaviour;

### Processing operation/processed

any act with respect to personal data, such as saving, collecting, organising, processing, using, consulting and erasing.

We use the definitions given in the GDPR with respect to any other terms that are used. The terms are defined in Article 4 of the GDPR.

# This privacy statement applies to:

- persons whose personal data we process in the context of our services;
- persons who apply for a job with us;
- persons with whom we have an agreement (this may also be an employment contract);
- persons who visit one of our websites;
- persons who receive our newsletter;
- persons who have contact with us via e-mail, by telephone or through the contact form on our website;
- persons who contact us for other reasons or whose personal data we otherwise process.

## On which GDPR bases and for which purposes do we process your personal data?



We process your personal data on one or more of the following bases:

- if this is necessary for the performance of an <u>agreement</u> to which you are a party or if precontractual acts are performed at your request;
- if this is necessary to comply with a statutory obligation;
- if this is necessary to represent our <u>legitimate interests</u> or the interests of a third party;
- if you have given your consent.

## Which of your personal data can we process?

#### Personal data:

First names, surname (Business) address Gender Date of birth, place of birth, country of birth Nationality Civil status Telephone number E-mail address Image

### Identification details

All data visible on an identity document, including citizen service number

### Partner data:

First names, surname

## Financial data:

All data required to provide payroll services
All data required for making or receiving payments
IBAN number
Safety net
No-risk policy
Right of recourse

# Data relating to job application, employment / work-related data:

Criminal data (certificate of conduct) – document

Employment contract

Performance and assessment

Reports of performance reviews

Reports of coaching interviews

Data relating to illness and absenteeism

Training courses

Data on the CV

Data in the application letter

# <u>Miscellaneous</u>

IP addresses

# For which purposes do we process your personal data?

To provide requested services or to execute an agreement we have with you

We may process the following data to provide our services or to execute an agreement:

- First names, surname
- Gender
- (Business) address
- Telephone number
- E-mail address



- All data required for making or receiving payments, including the IBAN number
- IP address

If you apply for a job or start working for one of the companies of the Endeavour group (based on an employment contract, contract for services or otherwise), we may also process the following data in addition to the above:

- Date of birth, place of birth, country of birth
- Nationality
- Civil status
- Identification details
- Financial data (only in case of employment)
- Partner data (only in case of employment)
- Data relating to job application, employment / work-related data
  - o Criminal data (certificate of conduct) document (only in case of employment)
  - o Employment contract (only in case of employment)
  - o Performance and assessment (only in case of employment)
  - o Reports of performance reviews (only in case of employment)
  - o Reports of coaching interviews (only in case of employment)
  - o Data relating to illness and absenteeism (only in case of employment)
  - o Training courses
  - o Data on the CV
  - o Data in the application letter

The bases for this purpose are: agreement, statutory obligation, legitimate interests, consent.

We keep your contact details for as long as we need them to provide the service or to execute the agreement. Pursuant to tax legislation and other legislation, we are obliged to keep financial data for 7 years.

If you apply to a job at our company, your data are kept in our systems for a period of one year. We destroy your personal data after that period has ended.

The company that performs or will perform the requested services or the company that carries out or will carry out the agreement with you collects the above personal data.

### For sending our newsletter

We have a newsletter. In the newsletter you can read news, tips and information about our products and services. We process the following personal data for sending the newsletter:

- First names, surname
- Telephone number
- E-mail address
- Gender
- IP address

# The basis for this purpose is: consent

You may cancel the newsletter subscription at any time. Every newsletter contains an unsubscribe link. We keep your personal data no longer than one month after you have unsubscribed from the newsletter.

# To stay in contact with you or to answer your questions

If you contact us by completing the contact form on one of our websites, telephoning or e-mailing us, you can ask us questions or make requests. To this end, we use your:

- First names, name by which you are known, surname
- Gender
- (Business) address
- Telephone number



F-mail address

The bases for this purpose are: agreement, statutory obligation, legitimate interests, consent.

We will keep your personal data as long as we need them to keep in contact with you. We will keep your personal data for a period of 12 months after the last contact.

To maintain statistics

We maintain statistics on the use of our company. We use these statistics to improve our company so that we only show relevant information for example.

To this end, we use your:

- IP address
- Gender
- E-mail address

The bases for this purpose are: legitimate interests, consent. We keep this information for one year. After this period, we may anonymise the data so they are no longer personal data within the meaning of the GDPR. We can keep anonymous statistical data for a longer period.

# To create a profile of you

We may combine your personal data to learn more about you. Naturally, we will respect your privacy at all times. Please inform us if you do not want your personal data to be combined. To this end, we use your:

- E-mail address
- Gender
- IP address

The basis for this purpose is: consent. We keep this information for 12 months.

# To show targeted advertisements

Our company shows advertisements. We check whether people like them, and use that information to only show fun or interesting advertisements and offers in the future.

The bases for this purpose are: legitimate interests, consent. We keep the data for 12 months.

The text above lists the types of personal data concerning you that we may process and the various purposes for which we may process them.

This list of personal data does not mean that we will always ask for all of those personal data. In this respect we apply the principles of data processing within the meaning of Article 5 of the GDPR. One of those principles is 'data minimisation', which means that we only collect data that are necessary for a specific purpose.

## **Statistics**

Our websites include social media buttons. The administrators of those services use them to collect your personal data. How third parties process your personal data is beyond our control.

## **Retention periods**

Specific retention periods are listed above. Your personal data will be destroyed after the statutory or other retention period. Statutory or other retention periods may change.



The listed retention periods do not apply in the event that we are under a statutory obligation to keep the personal data for a longer period.

#### **Cookies**

Our websites use cookies.

Cookies are small text files that are stored on your electronic device (computer, laptop, tablet, smart phone) when you visit a web page.

If a cookie is stored on your electronic device, this means that your electronic device can be recognised and information can be collected.

#### What do cookies do?

#### Functional cookies

These cookies ensure that our websites work properly.

#### Analytical cookies

These cookies collect information about our websites and help improve the websites.

We use Google Analytics to monitor how visitors use our websites. We have concluded/a processing agreement with Google. This includes strict arrangements about what they may monitor. We allow Google to use the information obtained through Google Analytics for other Google services. We do not have Google anonymise IP addresses.

### Statistical cookies

These cookies map the use of and interaction with our websites and help improve the websites.

# Tracking/marketing cookies

These cookies enable us to track your behaviour on our websites and on the Internet. This allows us to show you messages that are geared to your interests, such as special offers.

#### Allow, change or remove cookies

Some cookies collect personal data. That is why we need to ask your consent for some cookies before installing and reading those cookies. The cookie statements on our websites include more information about this.

You can disable the storage of cookies through your browser, but this means that some of our website functionalities no longer work properly.

We have made arrangements about the use of cookies with other companies that install cookies. Nevertheless, we cannot fully control what they do with the cookies. Therefore, we advise you to read their cookie statements as well.

# Provision to other companies or institutions

We do not sell your data to third parties.

We may transfer your personal data to the following categories of recipients:

• companies belonging to the Endeavour group



- o for example: if you apply for a job at our company or if you carry out work for us, your personal data will be transferred to the Human Resources (HR) department. This department is part of the private company with limited liability Endeavour Group B.V. Other companies that are part of the Endeavour group transfer your personal data to this company.
- suppliers and subcontractors 'processors'
  - o for example: payroll administrator
- other parties such as government agencies, courts and supervisory bodies that act as controllers (not processors)
  - o for example: occupational health services provider, financial insurer, pension provider, Immigration and Naturalisation Service (IND), Employee Insurance Agency (UWV)

We do not provide your personal data to other recipients or (categories of) recipients, unless this is necessary to achieve the purposes included in this privacy statement, if we are subject to a statutory obligation or after you have given your consent.

All recipients to whom we provide the personal data are obliged to keep your personal data secret and to properly secure them. If these parties are designated as 'processors' within the meaning of the GDPR, we conclude processing agreements with these recipients.

## Transfer of personal data to countries outside the European Economic Area (EEA)

In principle, we only process your personal data within the EEA. If personal data are transferred to a country outside the EEA, we take care of the appropriate safeguards in order to guarantee as much as possible that the transfer takes place in accordance with the applicable regulations within the EEA.

# Security

The security of your personal data is of great importance to us. We ensure that your data are properly secured. Please contact us if you have any questions about the security of your personal data or if you suspect misuse.

# **Your rights**

You have the following rights with respect to our processing of your personal data:

- Explanation as to which of your personal data we process and what we do with these data
- Access to your personal data that we process
- Having errors rectified or personal data modified
- Having personal data or outdated personal data removed ('the right to be forgotten')
- Having personal data transferred to another party ('the right to data portability')
- Withdrawing consent for the processing of your personal data
- Limiting the processing of your personal data
- Objecting to the processing of your personal data.

Please always state your identity clearly, so that we can be certain that we are not modifying or removing data of the wrong person. We may request additional information to verify your identity.

In principle, we will comply with your request within one month. However, this period may be extended by a maximum of two months for reasons relating to the specific rights of data subjects or the complexity of the request. We will inform you within one month after receiving your request if we are extending this period.



It is possible that we cannot or may not comply wholly or partially with your request(s). We will inform you if we are wholly or partially rejecting your request.

# Lodging a complaint

Please send an e-mail to info@endeavour.nl if you would like to lodge a complaint with regard to our processing of your personal data. We handle every complaint internally and will inform you in more detail.

You may submit your complaint to the supervisory body if our complaint handling does not have the desired result. This is the Dutch Data Protection Authority.

# **Data Protection Officer (DPO)**

We have appointed a DPO. This person is responsible for privacy within our organisation. Our Data Protection Officer is Fenna Brouwer and he may be reached by e-mail at fenna.brouwer@endeavour.nl and by telephone on +31 (0)23 727 1077 for all of your privacy-related questions and requests.

### **Contact details**

Endeavour Group B.V. is the controller with respect to the processing of your personal data. These are our details:

Endeavour Group B.V.
Gonnetstraat 32
2011 KA Haarlem
E-mail address: info@endeavour.nl
Telephone: +31 (0)23 727 1077
Chamber of Commerce number: 52162710

\*\*\*

We amend this privacy statement from time to time. Please find the most recent version on the websites of the Endeavour group. This version is dated: January 2024.

