



Athalos Global Services B.V.



## Privacy Policy

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This privacy policy statement defines what information we collect, how we collect this information, why and when we collect this information about individuals and staff and how we protect this information. This privacy statement is effective from 1st October 2020.

We are Athalos Global Services B.V., a limited liability company organised under the laws of The Netherlands and registered with the Chamber of Commerce 78458978 under number 78458978, based at Wilhelminakade 1, 2741 JV Waddinxveen, The Netherlands.

We are committed, and see it as our responsibility to protect your privacy. This means we collect and process information in accordance with the privacy regulations in the European Union (i.e. General Data Protection Regulation, GDPR), effective 25th May 2018.

We will ensure that information controlled by us remains private and is used only for purposes set below.

By using our website and sending us information, you consent to the processing of your personal information in accordance with this privacy statement.

## 1. Why and when we collect information?

Athalos Global Services B.V. uses the personal data obtained firstly for the execution of the contract we conclude with the client/partner within the framework of market and opinion research and for internal administration.

Furthermore, we collect and process information for the execution of our Human Resources (HR)- and Health, Safety and Environment (HSE) procedures. This means recruitment & selection, personnel management and administration, employment, payroll as well as implementing the practical aspects of environmental protection and safety at work (i.e. what organizations must do to make sure that their activities do not cause harm to anyone).

Collecting and processing this information is necessary to be able to carry out our activities properly. We collect the information you choose to submit on our website, or, information that you choose to send to us in some other way.

We may also collect information, which is publicly available on Social Media platforms (e.g. LinkedIn and Facebook), which we think could indicate that you could be an interesting candidate to join our team. If that is the case, then we will approach you and check whether we may contact you; all this in accordance with this privacy statement.



Note that Athalos Global Services B.V. can send newsletters by e-mail. If you no longer wish to receive a newsletter, you can unsubscribe by clicking the link at the bottom of the newsletter.

## 2. How we collect your information?

Athalos Global Services B.V. may receive information from you in the following ways:

- Directly from you: for example, by you entering into an agreement with us, by contacting us by email, telephone or in writing or by subscribing to our newsletter.
- Through our website: for the performance, improvement and registration of our services we collect various data through our website, including through the use of cookies.
- Via third parties: we may make use of the services of third parties. These third parties act on behalf of Athalos Global Services B.V. This privacy statement also applies to the data collected via these third parties when they act as processors for Athalos Global Services B.V. We are not responsible for the collection of data that is not commissioned by Athalos Global Services B.V. through third parties. In this respect, we refer to the privacy policy of these third parties.
- In dealings with our employees, contractors and consultants through phone calls, letter, emails, Internet or social media.
- Submitting a CV/resume, or, any information via website or email regarding an application.
- Subscribing to any other communication form used by us.
- Information that is publicly available on Social Media platforms.

## 3. What information we collect?

### 1. Personal and identifiable information we collect from partner companies, clients and authorities:

Athalos Global Services B.V. may process personal details about you, because you are making use of our services, and/or because you yourself provide these to us, when, for example, filling in a contact form on the website. Athalos Global Services B.V. can process the following personal details:

- Contact and account details, such as company name, company type, monthly turnover, monthly marketing expenditure, name, email address and telephone



number provided by you.

- Payment and invoice details; if you enter into an agreement with us, we will need your bank details for financial processing.
- Website data, such as IP address, traffic and location data and information on the use of our website(s).

The most important tool where we store these third-party data is in our cloud-based platform for customer relationship management (CRM) from Salesforce (the company that supplies and maintains the platform and therefore is responsible for the same).

Purpose of processing personal data

- For the purpose of entering into, maintaining and improving the contractual relationship with (potential) customers, or for the improvement of services and products.
- For the application and implementation of legal obligations.

Data retention period

We will keep this personal information no longer than necessary. The retention periods we use depend on the applicable statutory retention periods. We reserve the right to retain the information you provide up to 24 months after it has been collected.

## 2. Personal and identifiable information we collect:

- From applicants Athalos Global Services B.V. collects: – first and last name, – address, – date of birth, – contact information (email address and telephone number) and CV/resume.
- For the people we work with (i.e. employees, contractors, consultants), we collect the following information as well: – bank details, – copy of ID and national insurance number.

You may choose not to provide us with certain personal information.

Purpose of processing personal data:

- Comply with applicable laws and regulations;
- Start and execution of employment contract;
- Execution and fulfilment of agreements with the authorities and partner companies;
- Informing applicants and candidates about suitable job openings.

Data retention period

We will keep this personal information no longer than necessary. The retention periods we use depend on the applicable statutory retention periods.



We reserve the right to retain the information you provide up to 12 months after it has been collected.

## 4. Where is our data stored?

We will store your information in our secured cloud-based file sharing system (Sharepoint). This internal system is, regarding your personal data, only accessible for individuals, authorized by our management, who need these data for specific reasons, relevant to particular tasks.

Client-, partner- and authority data/information is stored in Salesforce, our CRM system (ref. Article 3.1).

Sharepoint and Salesforce comply with the European Union Data Protection Directive (EUDPD). The EUDPD was enacted to provide a consistent data protection framework with EU-level enforcement, and a baseline of security around information storage, transmittal, and processing. Sharepoint and Salesforce store all European customers' data and metadata on servers in their European datacenters. Data never leaves the EU; even when a customer opens a support ticket, it is handled by a European support team.

Sharepoint data is stored on servers in Europe.

## 5. Cookies

Athalos Global Services' website uses cookies, which store technical information. Cookies are small information files, that a website leaves on your device and which track your activities within our website. It involves, for example:

- The visitor's IP address;
- the date and time of the visit;
- the URL of the referring site (the site from which the visitor comes);
- the pages visited on our website;
- information about the browser used (type and version, operating system, etc.).

Technical information and cookies are used by us to facilitate your visit to the website and to optimise the performance and user experience of the website. Cookies can be placed both by Athalos Global Services B.V. itself and by other parties with whom Athalos Global Services B.V. cooperates. Below you will find an



overview of the types of cookies that are placed via the Athalos Global Services B.V. website.

#### Functional cookies

Athalos Global Services B.V. uses cookies which are necessary for the proper functioning of the website and the provision of a requested service. These cookies are used to store certain user and preference settings, to store any login details and to optimise the user-friendliness of the website.

#### Analytical cookies

Athalos Global Services B.V. uses analytical cookies, such as the cookies of Google Analytics, which collect information about the use of the website. This information includes the number of website visitors, the pages visited and the length of their stay. The collected data is used to improve the service and to adjust the content of the website optimally to the wishes and needs of the users.

Athalos Global Services B.V. will conclude a processing agreement with Google within the framework of the use of Google Analytics. This agreement ensures that the cookies of Google Analytics are set in the most privacy friendly way. Athalos Global Services B.V. has not given Google permission to use information obtained via Athalos Global Services B.V. for other Google services.

#### Tracking or advertising cookies

Tracking cookies are cookies that collect data about the (internet) behaviour of the user of the website. These tracking cookies are used to enable the user to make optimum use of our website. For example, these cookies are used to record information about the visit so that relevant information can be used for the user's convenience during a subsequent visit by, for example, already filling in forms or offering advertisements that match the user's (search) profile.

#### Disable cookies

By default, most browsers are set to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features and services, on our and other websites, may not function correctly if cookies are disabled in your browser.



## 6. Legal Basis of processing

When we process your personal information, we do this based on Art. 6 I a), b) or f) EU Data Protection Regulation. If we process your personal information because of Art. 6 I f) the legitimate interests, we pursue to demonstrate to the authorities and our partner companies that our people are capable of properly carrying out the tasks assigned to them.

## 7. When to get in touch with us?

- Accessing your information: you can get in touch with us at any time to request access to any personal information we hold about you and to be informed whether we process your personal information.
- Making sure your personal information is up to date: to ensure that your personal information is precise, complete and up to date you can get in touch with us to request rectification. We may also get in contact with you to check if the information you provided with us is still up to date.
- To request removal of personal information you provided us: you can get in touch with us to request removal of your personal information at any time.
- For a Data portability request: you may request a transmission of your personal information to another controller.
- To request restriction or object: to ensure that we only process your information with your consent you can request restriction of, or object to, processing your information.

A request for accessing information can be sent through the 'Access Request Form' (attached) [HR@athalos.com](mailto:HR@athalos.com).

We may request additional details in relation to your request. Upon receiving your request, we have 30 calendar days to identify you and to identify the information you requested. We may extend the response time by up to two months; in such a case we will explain to you the reason of the delay.

In any case we will issue you with a full response within 30 days. Athalos Global Services B.V. does not charge a fee to process an access request.

Please contact us at [HR@athalos.com](mailto:HR@athalos.com) for any clarification on the above.





## 8. Transfer of data

In case Athalos Global Services B.V. is involved in a sale, liquidation or merger of the company we may disclose and transfer your personal information to a third party as part of that transaction.

This happens only, on the condition that this third party uses your personal information, only, for the purposes you provided to us earlier.

You will be notified in the event of any such transfer and you will be given the opportunity to opt-out.

## 9. Sharing information

We will share your information with authorities and partner companies only, for the purposes that are described in this privacy statement. We will not share, sell or otherwise distribute your information to third parties.

Only when it is necessary, due to a legal obligation or a legitimate interest such as reasonable business operations, your personal data will be shared with:

- Our contracted service providers that process personal data on our behalf for IT and system administration and hosting, credit card processing, research and analytics, marketing, customer support and data enrichment;
- Affiliates within our current or future corporate group that process personal data for customer support, marketing, event management, technical operations and account management;
- Sponsors of events, webinar or contests for which you register;
- Third party social media and advertising networks, which usually act as separate controllers, so that we can advertise on their platforms;
- Specifically, in relation to our website, with our third-party partners and our ambassadors, who may contact you regarding their products or services;
- In individual instances, professional advisers who provide consultancy, banking, legal, insurance and accounting services, or if we are involved in a merger, reorganization, asset sale or business combination; and
- Public and government authorities, to the extent we are compelled to disclose personal data to comply with our legal obligations.

Athalos Global Services B.V. has accepted the privacy statements of the above-mentioned parties. respective websites.



## 9. Legal authorities

When legally obliged, personal information hold by Athalos Global Services B.V., may be disclosed to the government or law enforcement agencies.

## 10. Security Measures

Athalos Global Services B.V. undertakes substantial efforts to take appropriate organizational and technical measures to protect your personal information against unlawful processing and/ or loss. All Athalos Global Services B.V. employees, contractors and consultants are bound by our internal privacy policy to work in compliance with the applicable data protection law. Only employees who need information to perform a specific job are granted access to personal information. All employees, contractors and consultants, who have access to this information, are bound by a confidentiality clause.

## 11. Liability

Liability of Athalos Global Services B.V. for indirect damage, including consequential loss and loss of income, is in all cases excluded. We are not liable for any personally identifiable information sent to us not needed for the purposes mentioned in this privacy statement.

Furthermore, our site may contain references and/or hyperlinks to one or more websites of third parties. Athalos Global Services B.V. is in no way liable for the way in which these third parties deal with the privacy legislation.

Therefore, we strongly recommend you review the privacy policy of these websites, so you are aware of how these third parties deal with personal information.

## 12. Changes to this privacy statement



This privacy policy statement is in accordance with the GDPR which is effective per 25th May 2018. This privacy statement may be changed by us at any time. If we decide to change our privacy statement, we will post the changes on our website so that you are always informed about the information we collect and how we use this information.

## 13. Questions and complaints

If you have any questions, comments or complaints about the protection of your personal information by Athalos Global Services B.V., you can contact us by email at: [HR@athalos.com](mailto:HR@athalos.com).

In case of a suspected data breach we ask you to report this immediately by sending us an email to [HR@athalos.com](mailto:HR@athalos.com).

(Access Request Form follows)



# 14. Access Request Form

In accordance with the General Data Protection Regulations (GDPR), effective the 25th May 2018, you are entitled to receive a copy of any information we hold about you.

To ensure we are providing the information to the right person, you need to provide a proof of identity. Proof of your identity should include a photocopy/scanned image of two documents, i.e.

- 1) proof of identity: a passport, driving license or national identity card; and,
- 2) proof of address: an official letter addressed to you, household utility bill or bank statement (no older than 3 months).

Proof of identity is necessary before we can disclose any information. In case, we are not assured that you are, who you claim to be, we reserve the right to refuse your request.

We strive to answer your request within 30 days upon receiving a fully completed form and proof of identity.

When the request is granted the personal data will be forwarded to you in a readable format by e-mail.

Your details:

- Full name :
- Address :
- Postal code, place of residence :
- Telephone number, email address :

Your authorization:

I, ....., wish to have access to the information as described below that I know/believe Athalos Global Services B.V. holds on me.

Specify which information you require:

.....  
.....

Date: .....

Your signature: