

# PRIVACY STATEMENT

APRIL 2020

This is the "Privacy Statement" of HLB Nederland Accountants & Consultants BV, HLB Amsterdam Audit BV, HLB Amsterdam BV, HLB Blömer accountants and consultants BV, HLB Matchers BV, HLB Van Daal Advisors and Accountants BV, HLB Van Daal Audit BV, HLB Den Hartog Accountants & Consultants and HLB Nannen Accountants & Tax consultants, collectively referred to as: "HLB".

HLB is responsible for processing your Personal Data. This Privacy Statement describes how this data processing takes place and for what purposes this data is processed. HLB collects and processes Personal Data about customers and visitors, for example, for the benefit of its business operations and the provision of its (online) services, to market products and services and to make them available if they may be of interest to you.

By using the services of HLB, or by requesting information, or by visiting the Website of HLB, you agree to the following conditions that apply.

## 1. DEFINITIONS

In this Privacy Statement the following terms have the following meaning:

*AVG: the General Data Protection Regulation;*

*Personal data: all information about an identified or identifiable natural person, as defined in Article 4 AVG;*

*Privacy Statement: this HLB privacy statement;*

*Processor: a natural or legal person, a government agency, a service or any other body that processes personal data on behalf of the controller, as referred to in the AVG;*

*Website: the websites of HLB include the domain names:*

- www.hlb.nl
- www.hlb-van-daal.nl
- www.hlb-matchers.nl
- www.hlb-denhartog.nl
- www.hlb-nannen.nl
- www.hlb-blomer.nl
- www.hlb-amsterdam.nl
- kennis.hlb-van-daal.nl

## 2. PROCESSING OF PERSONAL DATA

2.1 HLB collects Personal Data if you choose to make these available to HLB, whether or not in the context of the execution of an agreement with you, for example by leaving your e-mail address or by registering interests for certain services that HLB offers. You may have previously provided Personal Data to HLB (for example, if you are already a customer or have already been a customer).

2.2 HLB processes Personal Data in any case before/in the following ways:

- Execution of the agreement, work or assignment
- Visit Website (see below under 2.2)
- Newsletters
- Marketing purposes
- Social media
- Request information or quotations
- Recruitment and selection of personnel
- Information provided by you or your adviser to our office.

2.3 HLB generally only processes information that is necessary to carry out our work. You will be notified in cases where you are asked for mandatory information.

2.4 If you make use of our services, you may need to provide certain Personal Data about yourself on your own initiative or be required to provide certain Personal Data about yourself. This collection takes place for example in the following cases:

- (i) When visiting the Website, the servers store automatically (anonymized) information, such as URL, IP address, browser type and language, date and time of visit ("Visitor data"), all in accordance with article 6;
- (ii) HLB will process the contact details provided by you (such as name and e-mail address) for a request for (further) information and/or registration for the digital newsletter;
- (iii) If you inform us via the Website that you are interested in working at HLB or if you send us a curriculum vitae to apply for one of HLB's vacancies, HLB will use your Personal Data, in accordance with article 4;

(iv) To create a personal account on the Website, you must provide your (full) name, address, e-mail address and password for the registration of certain parts of the Website.

## 3. LEGAL BASES FOR PROCESSING

3.1 If HLB processes your Personal Data, this processing is based on one of the following principles:

- Your Personal Data may be processed if this is necessary for the execution of an agreement with you;
- The processing of your Personal Data is necessary to comply with legal obligations, such as keeping files for tax purposes or providing information to a public institution or enforcer;
- Your Personal Data may be processed on the basis of a legitimate interest of HLB. This processing is permitted as long as your interests do not weigh more heavily. A legitimate interest can, for example, be involved in processing for the purpose of:
  - (i) Marketing;
  - (ii) Acquisition of orders (sales) in the case of existing customers with whom HLB has a commercial relationship;
  - (iii) Managing existing customers and relationships (relationship management and account management);
  - (iv) Optimizing or personalizing content (from the Website);
  - (v) Conducting and optimizing effective business operations;
- You have specifically and explicitly granted permission to process Personal Data for a specific purpose. We will then only process your Personal Data for the purpose for which we have obtained your consent. In the aforementioned case, you can withdraw your data consent at any time.

## 4. RECRUITMENT

4.1 Because HLB also uses the Website as a recruitment tool, you can send your curriculum vitae to HLB during a visit to the Website. The personal data provided by you in this context will be used by HLB exclusively for the following purposes:

- for recruitment and selection purposes within HLB;
- for communication purposes; for example, to make an appointment if HLB wants to invite you for an introduction or job interview;
- if your application has been processed for the assessment of your suitability for a position at HLB that is or may become vacant.

## 5. UNIQUE PERSONAL DATA

5.1 Unique personal data, as defined in the AVG, will only be collected by HLB if you have provided it voluntarily or if this is necessary or permitted by law and/or regulations. Unique personal data means at least: ethnicity, political opinion, religion, philosophy of life, health or sexual orientation. If you provide HLB with special personal data, for whatever reason, HLB will assume that you explicitly authorize HLB to process this information.

## 6. AUTOMATIC COLLECTION OF PERSONAL DATA

### 6.1 IP-ADRES

6.1.1 An IP address is a number assigned to your computer when you access the internet. It offers computers and servers the ability to recognize you and communicate with others. IP addresses from which visitors appear to be originating can be registered by HLB for IT security and diagnostic purposes. This information can also be used in aggregated form by HLB to identify trends in the use of the Website and to perform performance analyses.

### 6.2 COOKIES

6.2.1 In order for the Website to function properly, HLB makes use of functional and analytical cookies. Cookies are small text files that a computer stores when a website is visited. The cookie remembers what you enter on the website for a subsequent visit, so that the content of the website can be tailored to the user concerned and it is not necessary for personal details to be filled in again.

6.2.2 Most browsers are configured to accept cookies

by default, but you can set your browser to refuse all cookies or to indicate when a cookie is being sent. However, some features and services on the Website and other websites of HLB may not function correctly if cookies are disabled in your browser.

### 6.3 WEB BEACONS

6.3.1 HLB advertises on third-party websites. In order to measure the success of advertising, HLB can use visitor recognition technology with names such as 'web beacons' or 'action tags' that count the number of visitors that have ended up on the Website after they have been shown an HLB advertisement on the third party website. HLB does not use this technology to obtain Personal Data, but uses it to measure the effectiveness of the advertisements.

6.4 By using the Website you agree to the placing of cookies and web beacons on your computer or mobile device. If you do not wish to receive cookies or web beacons, you no longer have to visit the Website or adjust the settings of your browser.

## 7. SOFTWARE TOOLS EN SOCIAL MEDIA

7.1 HLB uses various software tools such as: Google Analytics, a web analytics service provided by Google, Inc. ("Google"), HubSpot and Hotjar. For example, Google Analytics is used for analysis and improvement of the use of the Website.

7.1.1 HLB has signed a processor agreement with Google. HLB has also masked the last octet of IP addresses, so that no full IP addresses are collected by Google Analytics. Furthermore, all options regarding data sharing with Google in Google Analytics are disabled. Finally, HLB does not use other Google services in combination with Google Analytics.

7.1.2 Google offers an opt-out option for Google Analytics through a browser extension, preventing your data from being used for Google Analytics. If you want to use this, you can download the browser extension [here](#).

7.2 It may be that through these software tools personal data are collected from you, which are then anonymized and cannot be traced back to you. You are advised to read the privacy statements associated with these software tools (which can change regularly) to see what they do with this data.

7.3 On the Website buttons are also included to share the Website on social media sites such as [Facebook from Facebook Inc., Twitter from Twitter Inc. and YouTube from YouTube LLC] ("social media"). These buttons work through bits of code that originate from social media itself. Cookies are placed using these codes. HLB has no further influence on this. You are advised to read the privacy statements of social media sites (which may change regularly), to see what they do with the personal data they collect through these cookies.

7.4 The software tools and the social media may provide the information gathered via their cookies to third parties if they are legally obliged to do so, or insofar as these third parties process the information on behalf of (one of) them. The software tools and the social media state that they comply with the privacy regulations that apply. This means that there would be an appropriate level of protection for the processing of (personal) data. HLB is not responsible for this and excludes all liability in this respect.

## 8. E-MAIL

8.1 E-mail messages can also be sent in various ways. In the messages that are sent in this way, your user name and your e-mail address can be mentioned, as well as any additional information that you include in the message. If you send us a request or comments via e-mail, it is possible that HLB processes the aforementioned Personal Data to, for example, contact you in order to answer your e-mail.

## 9. DIRECT MARKETING

9.1 Except mailing lists, for example, for which you can register and indicate that you wish to receive specific marketing material, other publications and/or information from HLB, HLB can also use your Personal Data to support its direct marketing activities. If you do

not appreciate information about the (new) services provided by HLB, which you may have been sent unsolicited, you can indicate this when you submit your Personal Data or in response to an e-mail that you receive from HLB. HLB will then block the processing of your Personal Data for direct marketing purposes.

#### **10. DERDEN**

- 10.1 HLB has engaged several Processors for the processing purposes listed in this Privacy Statement, with whom it has entered into various processor agreements that ensure that the Processors offer sufficient guarantees regarding technical and organizational security measures with regard to the processing operations to be carried out.
- 10.2 HLB may share Personal Data with government bodies, tax authorities, notaries and/or the commercial register of the Chamber of Commerce if and insofar as this is necessary in the context of the execution of the agreement with you. HLB may also share information with other advisors or other external parties if this is required within the context of the execution of the agreement and only after explicit permission from you.
- 10.3 HLB may share your Personal Data with external companies or service providers that work on our behalf in order to comply with your requests. In that case, an appropriate (processing) agreement will be concluded with the relevant third parties, in which, among other things, correct and secure processing of the Personal Data is guaranteed.
- 10.4 HLB can also store Personal Data in a country other than where you are based or live. If and insofar as HLB Personal Data is transferred abroad, this will take place in accordance with European (and Dutch) privacy legislation.
- 10.5 HLB may process Personal Data in connection with the sale or transfer of the services within the context of which the Personal Data is processed.
- 10.6 HLB is also obliged in certain situations to disclose Personal Data, for example a statutory provision, a court order or a government order.
- 10.7 Your Personal Data may be necessary for privacy or security audits or for carrying out an investigation as a result of a complaint or a threat to safety. HLB will comply with this.
- 10.8 HLB does not sell Personal Data to third parties.
- 10.9 For the rest, HLB will not provide your Personal Data to third parties, unless this is necessary for the performance of its services, on the basis of a statutory provision or in an emergency, to the extent that this is in your interest in the reasonable opinion of HLB.

#### **11. TRANSFER TO OTHER HLB ENTITIES**

- 11.1 HLB can pass on Personal Data to other HLB entities that are part of the HLB network. However, these entities may only use the Personal Data for the purpose for which you provided them to HLB. When you place data on the Website, HLB assumes that you expressly authorize HLB to share that information with other HLB entities that are part of the HLB organization and you will be asked on the relevant web pages on which you can provide Personal Data to express your consent to HLB by clicking on a button.

#### **12. EXTERNAL LINKS**

- 12.1 HLB has included links to third-party websites. If you go to another website via such a link, the Privacy Statement no longer applies. It may occur that these third parties or others collect information about you on these websites. HLB is not responsible for the content of these websites nor for the actions of these third parties and others. We advise you to read the privacy statement of these websites before providing (Personal) data.

#### **13. RIGHTS WITH REGARD TO THE COLLECTED DATA**

- 13.1 You have the right to inspect your Personal Data that HLB processes from you. To do this you can ask HLB what data is registered and how it is used. You will find our contact details at the bottom of this Privacy Statement.
- 13.2 You have the right to have the Personal Data that HLB collects from you corrected, modified or supplemented if it is incorrect or incomplete.
- 13.3 In a number of legal cases you have the right to have

your Personal Data deleted.

- 13.4 In a number of legal cases you have the right to have a minimum of Personal Data processed by HLB.
- 13.5 In a number of legal cases you have the right to have your Personal Data passed on to third parties.
- 13.6 You have the right to object to the processing of your Personal Data by HLB.
- 13.7 You have the right to file a complaint with a supervisory authority.
- 13.8 If you have given your consent for the processing of your Personal Data you may withdraw this permission at any time. You can send a request to HLB to do this.
- 13.9 If you have previously registered for newsletters and you no longer wish to receive them, you must unsubscribe separately via the link in the email.

#### **14. CHILDREN**

- 14.1 The Website is not intended for use by children aged under 16. HLB understands the importance of protecting the privacy of children, especially in an online environment and does not collect or store information about children consciously, unless this is part of a specific assignment within the framework of the services of HLB or part is part of the Online Services HLB.

#### **15. STORAGE PERIOD**

- 15.1 HLB will not store your Personal Data for longer than is necessary for the execution of its (Online) services, unless it is obliged by law and/or fiscal provisions to retain Personal Data for longer.

#### **16. SECURITY**

- 16.1 HLB has taken appropriate technical and organizational measures to protect your Personal Data against loss or unlawful processing, including:
  - 16.1.1 Storage of that data in a secure database with encrypted passwords and secure backups;
  - 16.1.2 Access to your own data via a personal account with a unique username and password;
  - 16.1.3 All HLB employees must comply with the security regulations that apply to the entire organization;
  - 16.1.4 Personal data is only accessible to authorized employees of HLB, and
  - 16.1.5 These employees have committed themselves to ensuring the confidentiality of this information.
- 16.2 Although HLB has taken and will take all appropriate security measures, the processing of your Personal Data involves risks that are inherent in, for example, the use of the internet in social transactions.

#### **17. CONTACT**

- 17.1 In the event of any queries, suggestions or complaints about this Privacy Statement or other aspects of our services, please contact us at [avg@hblb.nl](mailto:avg@hblb.nl).

#### **18. AMENDMENTS**

- 18.1 HLB reserves the right to change this Privacy Statement. The date of the last amendment is listed at the foot of the Privacy Statement. You are advised to regularly check this Privacy Statement on the Website. Your continued use of the Website after amendments means that you agree with the amended Privacy Statement.