



Privacy Statement Hapam Business Contacts

We believe it is important that we clarify the way in which we handle your personal data. This Privacy Statement is to inform you of our procedures.

1. Who are we and how can you contact us?

Hapam B.V. (Hapam) is the party responsible for processing your data and has its registered office at Voltaweg 30, 3752 LP in Bunschoten-Spakenburg, the Netherlands. Our [Dutch] Chamber of Commerce registration number is 31026639. You can call us on +31 (0)33-298 30 04 or send an email to hapam@hapam.nl

2. Who does this Privacy Statement apply to?

This Privacy Statement applies to Hapam's business contacts and how their data is processed.

This Privacy Statement applies to:

- our customers' contacts
- our potential customers' contacts
- suppliers' contacts
- affiliates' contacts
- visitors to our website
- participants invited by Hapam to events such as trade fairs or seminars
- all other persons who contact us or whose personal data we process in the context of business operations

3. What personal data do we process?

We process personal data that you have personally provided to us, and personal data we have obtained from other sources, such as business websites and social media.

Personal data you have personally provided to us:

- contact details and other personal data in the context of our business collaboration, such as your name, telephone number and email address
- contact details and other personal data provided by sending emails to email addresses listed on the Hapam website
- contact details provided during trade fairs, seminars and other meetings or introductions, such as, for example, information given on business cards that have been exchanged
- other personal data you have provided us with

Personal data that we have derived from other sources:

- personal data such as data that can be found on public social media for businesses, such as LinkedIn
- personal data derived from the Trade Register of the Chamber of Commerce [Netherlands]
- personal data available on public government or corporate websites



4. **For what purposes do we use your personal data?**

We use your personal data for different purposes. We have listed them below:

- To fulfil an agreement.

If we enter into an agreement with you or with the company or government agency to which you are affiliated, we will use your contact details to fulfil the agreement, including invoicing.

- For the purpose of maintaining contact.

We keep your contact details, such as name, email address and telephone number, in our ERP system and use these to maintain contact with you within the context of our business relationship.

- To fulfil a legal obligation.

Tax laws may require us to process and retain certain personal data.

5. **Legal basis for processing personal data**

We process your personal data based on one of the following legal grounds of the General Data Protection Regulation (GDPR):

- Consent
- On the basis of a contract or preparatory to the conclusion of a contract
- Legal obligation
- In connection with a legitimate interest

We may only process your personal data on the basis of one of the legal grounds specified in the General Data Protection Regulation (GDPR). The four legal grounds on which Hapam relies are the following:

Consent

- If we have asked you for your consent to process your personal data and you have given your consent; you always have the right to withdraw your consent. You can do this by contacting us.

Agreement or preparatory to the conclusion of an agreement

- If we enter into an agreement with you, we will process your personal data, such as your contact details, if this is necessary for the performance of the agreement.

Legal obligation

- Tax laws may require us to process and retain certain personal data.

Justifiable interest

- We may also process personal data if we have a legitimate interest and do not thereby disproportionately violate your privacy. For example, we may use your contact details to invite you to trade fairs, seminars and other activities. If you have any objections to this, please contact us. We may use your contact details to contact you, if you have personally contacted us.

6. **Sharing personal data**

Our basic principle is that we do not share your personal data with third parties. However, the provision of personal data to third parties may nonetheless be necessary, for example in the event that consultants are engaged, or in order to fulfil statutory obligations.

- Accountants or other advisers may need access to your personal data as part of their service to us.
- In the event that a legal duty or a court ruling obliges us to provide personal data to third parties, we will have to comply with this. This may occur when, for example, a government agency such as the Tax Authorities require this information for the performance of their responsibilities.

7. **Processors**

We may engage external suppliers (processors) to process your personal data. These processors may not use your personal data for their own activities and purposes. They process your personal data strictly on our behalf. We conclude a processing agreement with these processors that complies with the requirements of the General Data Protection Regulation (GDPR).

8. **How long do we store your data?**

We will not store your personal data longer than necessary. Personal data of contacts will be deleted if there has not been any contact with these persons for more than three years. We also comply with the statutory general and tax retention obligation of seven years.

9. **Personal data transfer to countries outside the European Economic Area (EEA)**

Your personal data is stored on our own systems located in the Netherlands. The basic principle is that we do not pass on your personal data to parties outside the EEA. If a transfer should nevertheless take place to a party outside the EEA, we will ensure that an appropriate guarantee is provided, unless the transfer can take place on the basis of one of the specific exceptional situations provided for in the GDPR. An appropriate safeguard may, for example, be the agreement of standard clauses approved by the European Commission or, in the event of a transfer to a US party, the provision to a party that has registered with the EU-US Privacy Shield.



10. **If you wish to exercise your rights**

You may exercise certain rights with regard to your personal data on the basis of the General Data Protection Regulation (GDPR). This gives you the right to access, rectify and delete personal data. You may also object to the use of your personal data or request to restrict its use. In certain cases, you may request your personal data and transfer your data to another party. If you wish to exercise any of these rights, please contact us. The contact details can be found in paragraph 11.

11. **Who should you contact with questions and complaints?**

If you have a question or a complaint about how we handle your personal data, you can always contact us by sending an email to: hapam@hapam.com, or by calling +31 (0)33-298 30 04. Together with you, we will look for the answer to your question or find a solution for your complaint. If we are unsuccessful, you can contact the Personal Data Authority via <https://autoriteitpersoonsgegevens.nl/>

12. **Third party websites**

Our website www.hapam.nl contains hyperlinks to websites of other parties. We are not responsible for the content of those websites. Hapam is also not responsible for the privacy policy and the use of cookies on those websites.

13. **Changes to the Privacy Statement**

New developments may sometimes change the personal information we request from you and its use. Regulations may also change, in which case we will amend this Privacy Statement. We therefore invite you to regularly review the Privacy Statement to remain up-to-date. If the Privacy Statement is changed, we will inform you on our website in due time.

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